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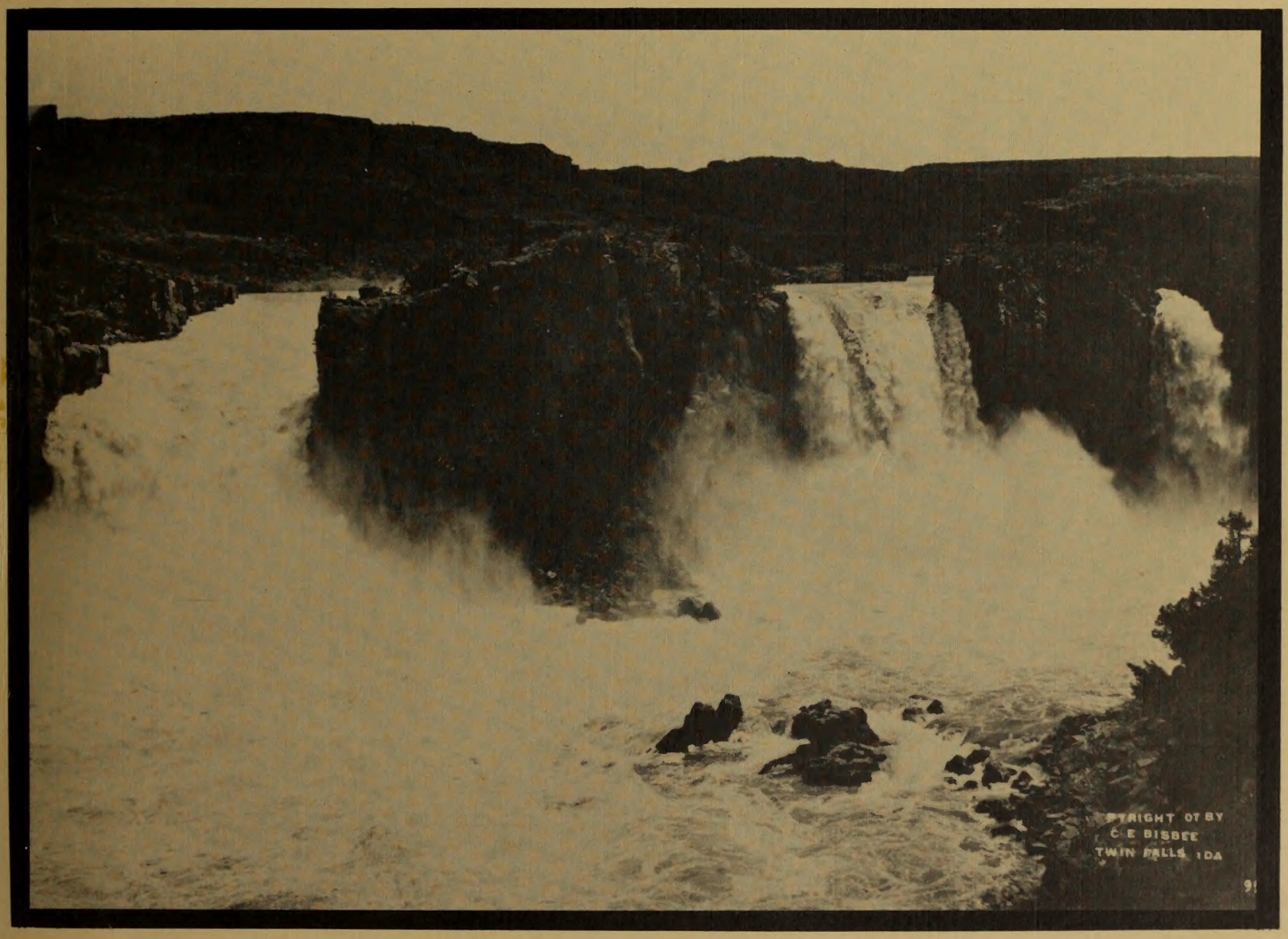
TWIN FALLS
LIVESTOCK GRAZING
ENVIRONMENTAL IMPACT STATEMENT
FINAL



U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
BURLEY DISTRICT
IDAHO
JUNE 1982

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COVER PHOTOGRAPH:

Twin Falls of the Snake River circa 1907
Photo taken by C. E. Bisbee
Photo courtesy of The Twin Falls County
Historical Museum

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Burley District Office
Route 3, Box 1
Burley, ID 83318

Dear Reader:

Attached for your review is the Final Twin Falls Livestock Grazing Environmental Impact Statement. The statement was prepared by the Burley District, Bureau of Land Management, pursuant to Section 102 (2)(C) of the National Enviromental Policy Act of 1969.

The statement describes and anlyzes the environmental, economic, and social effects of proposed grazing management on 231,298 acres of public land in southcentral Idaho. Five alternative levels of livestock grazing are considered.

The preparation of this final statement differs from the past procedure of reprinting the entire draft statement. This statement includes only those changes that are necessary in the Draft EIS and responses to public commments received on the Draft EIS.

This document, used with the draft statement distributed to the public on January 26, 1982 and the Addendum to the draft distributed on February 16, 1982, constitutes the Final Enviromental Impact Statement.

This final statement is not a decision document; it merely discloses the probable impacts to the human environment that the proposed action and alternatives would create. The decision on the action to be taken will be based on the analysis contained in the Final EIS, BLM's manpower and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs for the area. Decisions cannot be enacted for at least 30 days following filing of the final statement with the Environmental Protection Agency and distribution to the public. A summary document outlining the management direction for the Twin Falls EIS area will be prepared and made available as soon as a decision is reached. More specific decisions will subsequently be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely yours,

Nick James Cozakos

Nick James Cozakos
District Manager

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DEPARTMENT OF THE INTERIOR

TWIN FALLS
LIVESTOCK GRAZING
ENVIRONMENTAL IMPACT STATEMENT
FINAL

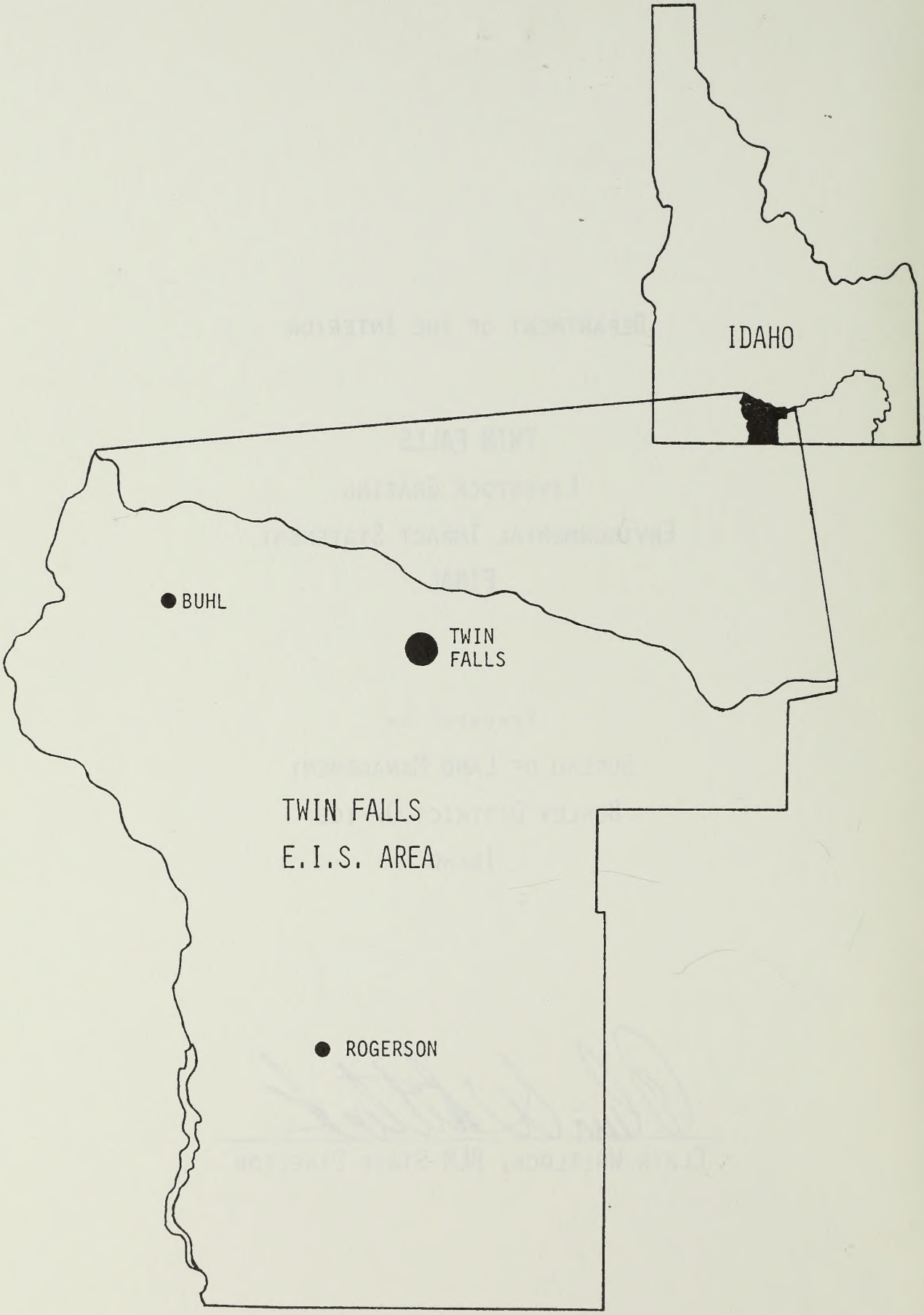
Prepared by

BUREAU OF LAND MANAGEMENT

BURLEY DISTRICT OFFICE

IDAHO

CLAIR WHITLOCK, BLM STATE DIRECTOR


IDAHO
BUHL
TWIN
FALLS
TWIN FALLS
E.I.S. AREA
ROGERSON

TWIN FALLS GRAZING
ENVIRONMENTAL IMPACT STATEMENT

( ) Draft (X) Final Environmental Impact Statement

1. Type of Action: (X) Administrative ( ) Legislative

2. Responsible Agencies:

   a. Lead Agency: Department of the Interior, Bureau of Land Management

   b. Cooperating Agencies: None

3. Abstract: The Twin Falls Grazing Environmental Impact Statement analyzes the effects of livestock grazing on 231,298 acres of public land in southcentral Idaho. Five grazing management alternatives are presented for consideration and are analyzed in terms of their projected economic, social and environmental effects. Each alternative analyzes a different level of allocating the vegetative resource among competing users.

   This document will be used to determine the proper level of livestock grazing on the public lands, using the multiple use sustained-yield concept. Its contents exemplify the conflicting demands being placed on public lands throughout the west and the fact that concessions are necessary to achieve parity between resource needs and resource use. The rangeland management program selected for the subject public land will be based upon the anlysis presented in this document.

4. Comments Have Been Requested and Received from the Following:

   See Page 1 - Commments on the draft statement were received from those agencies, organizations, and individuals marked with an asterisk.

5. Date Draft Statement Made Available to EPA and the Public:

   Draft: January 29, 1982

SUMMARY

The purpose of this environmental impact statement (EIS) is to analyze the effects of implementing a livestock grazing program on 231,298 acres of public land in Twin Falls County, Idaho. The analysis developed in this document will provide the decision-maker and the public with an assessment of environmental impacts which would result from implementation of the livestock grazing program. The proposed management alternatives were developed through the Bureau of Land Management (BLM), Burley District's Management Framework Plan for the Twin Falls Planning Unit. With the exception of one alternative designed to maximize livestock grazing, the five alternatives addressed are designed to improve or maintain soil, watershed, vegetation, wildlife, and other resource conditions.

Alternative levels of forage allocation, methods of livestock grazing management, and necessary supporting facilities (i.e., water developments, fencing, land treatment projects, etc.) are addressed. Alternatives in addition to the proposed action (a multiple-use mix of activities providing benefits to all resources) are: 1) increased livestock use, 2) existing stocking level, 3) reduced livestock use, and 4) no livestock grazing.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

The BLM has analyzed the impacts of the following five alternatives:

Alternative A - Proposed Action (Preferred Alternative). The Proposed Action would allocate vegetation for consumptive use by livestock (on 76 allotments) and big game (mule deer and antelope). Vegetation would be allocated to satisfy present and projected wildlife numbers determined during the BLM planning process and consultation with the Idaho Department of Fish and Game (IDFG). Initially, livestock use would be reduced from the six-year average on 25 allotments, remain unchanged on 18 allotments, and increase on 33 allotments. The initial allocation to livestock would be 55,076 AUMS - 21 percent above grazing preference, one precent above the six-year average use. The allocation for wildlife would be 2,661 AUMs which satisfies the needs of present big game populations. The long-term allocations would increase to 4,405 AUMs to provide needed forage for projected big game populations and 71,210 AUMs for livestock. New range improvements and maintenance of existing land treatments would provide the bulk of this increase. This level of livestock use is 57 percent above preference, 31 percent above average use. Livestock use on 10 allotments would remain below the current level of use.

Under the Proposed Action four grazing management systems would be used: 1) rest-rotation on 19 allotments (60,138 acres), 2) deferred rotation on 32 allotments (128,025 acres), 3) seasonal use on 15 allotments (27,439 acres), and 4) custodial use on 12 allotments (7,740 acres). Three treatments - grazing prior to seedripe, grazing after seedripe, and yearlong rest - would be employed under rest-rotation and deferred rotation systems. Existing allotment management plans (AMPs) would continue to be implemented (28 AMPs covering 32 allotments) and updated as necessary. New AMPs and/or Integrated Ranch Plans (IRPs) would be developed as needed.

Implementation of the Proposed Action would require installation of the following range improvements and land treatment maintenance:

Water Troughs	- 30	Cattleguards	- 15
Fences	- 13.75 mi.	Plow and Drill Seed	- 416 ac.
Pipelines	- 25.75 mi.	Rail and Aerial Seed	- 150 ac.
Spring Developments	- 2	Burn and Drill Seed	- 5,364 ac.
Reservoirs	- 6	Spray and Drill Seed	- 4,011 ac.
Pumping Stations	- 1	Spray	- 3,603 ac.

Seeding Maintenance:

Burning	- 21,812 ac.
Spraying	- 10,848 ac.
Railing	- 294 ac.

Also included in the Proposed Action are the following wildlife projects:

Fences	- 11.05 mi.	Big Game Guzzlers	- 3
Pipelines	- 0.75 mi.	Bird Guzzlers	- 11
Potholes	- 2		

Alternative B - Increased Livestock Use. The initial allocation of vegetation for consumptive use under this alternative includes 2,661 AUMs for wildlife and 61,994 AUMs for livestock. This allocation level would result in 19 allotments being stocked below present levels, six allotments remaining unchanged, and 51 allotments being stocked at higher levels. The initial livestock allocation is 37 percent above grazing preference, 14 percent above the six-year average. Present wildlife needs would be met, but only 3,294 AUMs would be allocated over the long term, resulting in a 1,111 AUM shortfall in satisfying the needs of future mule deer populations. The long-term livestock allocation would be 89,287 AUMs with new range improvements and maintenance providing the additional AUMs. This level is 97 percent above preference and 64 percent above average use. Four allotments would continue to be stocked below present levels.

The same grazing systems incorporating the same treatments as in the Proposed Action would be implemented as follows: rest-rotation on 19 allotments (61,806 acres), deferred rotation on 35 allotments (152,340 acres), seasonal use on 13 allotments (2,834 acres), and custodial use on 11 allotments (6,362). Again, existing AMPs would continue in force and new AMPs/IRPs would be developed as necessary.

In order to provide the additional forage needed to meet the long-term allocation, the following range improvements and land treatment maintenance would be completed:

Water Troughs	- 36	Wells	- 2
Fences	- 18.5 mi.	Plow and Drill Seed	- 638 ac.
Pipelines	- 29.0 mi.	Rail and Aerial Seed	- 280 ac.
Spring Developments	- 3	Burn and Drill Seed	- 15,115 ac.
Reservoirs	- 7	Spray and Drill Seed	- 12,108 ac.
Cattleguards	- 15	Spray	- 20,209 ac.
Pumping Stations	- 2	Drill Seed	- 600 ac.
Storage Tanks	- 2		

Seeding Maintenance:

Burning	- 22,027 ac.
Spraying	- 13,269 ac.
Railing	- 294 ac.

Alternative C - Existing Stocking Level. Under this alternative the initial and long-term forage allocation would be the current six-year average use of 54,472 AUMs plus 283 AUMs on two new allotments for a total livestock allocation of 54,755 AUMs. With the exception of the two new allotments, the current stocking level on all allotments would be maintained. This allocation is 21 percent above grazing preference. Initially, 2,661 AUMs would be allocated for big game with this increasing to 4,405 AUMs over the long term. This allocation provides for the needs of present and projected big game populations as developed by IDFG.

The same grazing systems and treatments would be employed as in previous alternatives. No change from current management would be made with 15 allotments (54,828 acres) under rest-rotation, 20 allotments (49,638 acres) under deferred rotation, 32 allotments (112,474 acres) under seasonal use, and 11 allotments (6,362 acres), including the two new allotments, under custodial use. Existing AMPs would continue to be implemented and updated as necessary, but no new AMPs/IRPs would be developed or implemented.

To continue vegetative production at current levels, land treatment maintenance as identified in Alternative A would be completed. This would ensure that current stocking levels are maintained. Other range developments would also be maintained. No new project work would be undertaken.

Alternative D - Reduced Livestock Use. The initial and long-term forage allocation for livestock use would be 34,783 AUMs (23% below grazing preference, 36% below the six-year average licensed use level). Several factors which would benefit wildlife, watershed, and other resources were incorporated into this alternative, thus resulting in the reduced allocation for livestock. The initial allocation for wildlife would be 4,405 AUMs which would satisfy the needs of present as well as future populations.

Grazing management would be the same as under Alternative C. Changes in period of use would occur on ten allotments, benefiting wildlife by eliminating early spring livestock grazing.

No range improvements or land treatment maintenance would be undertaken. Wildlife and watershed projects would be developed to improve riparian vegetation and wildlife habitat. The following projects would be included:

Fences	- 25.05 mi.	Big Game Guzzlers	- 3
Pipelines	- 0.75 mi.	Bird Guzzlers	- 11
Potholes	- 2		

Alternative E - No Livestock Grazing. All livestock grazing on public lands administered by the BLM would be terminated. All grazing permits and AMPs would be cancelled. All public land in the EIS area would be unallotted. The only forage allocation for consumptive use would be 4,405 AUMs for big game which would satisfy present as well as future needs.

Existing range developments and land treatments would be maintained only if beneficial for non-livestock uses. No new range development would be undertaken unless necessary for non-livestock programs.

ENVIRONMENTAL CONSEQUENCES

The Proposed Action, Existing Stocking Level, and Reduced Livestock Use alternatives were found to be generally beneficial to the various resource values, though some adverse affects were present under each. The increased Livestock Use alternative would have the greatest adverse affects on other resource values because of the significantly higher forage allocation and higher

level of range improvement work required to produce forage. Impacts of the No Livestock Grazing alternative would be mixed with adverse affects on economic and social values and generally beneficial affects on other resources.

Consequences of the Proposed Action Alternative. Soil erosion on 71 percent of the allotment acreage would decrease, while it would increase on only two percent. Estimated sheet erosion rates would drop from .69 tons/acre/year (T/A/Y) to .56 T/A/Y. Watershed cover (combined vegetation and litter) of 60 percent or more would increase from 64 percent to 76 percent. Minimal localized improvment in water quality would result from this alternative.

Long-term vegetative production is expected to increase by 19 percent. Range condition and trend would improve significantly. Overall, vegetative cover would improve slightly (from 43% to 44%). Seven percent of the riparian vegetation would improve because of fencing, but the remaining areas would not show any improvement (70% is presently in fair or poor condition).

Big game forage requirements would be met over both the short and long term, but conflicts would still occur from grazing on critical mule deer winter range (82%) and summer range (86%), and spring grazing on antelope habitat (100%). All species would benefit from additional water developments. Improved cover and increased forage would benefit most species (7% decrease in forage allocation on critical sage grouse habitat). Increased grazing, particularly in the spring, would adversely affect ground-nesting birds including two sensitive species - the long-billed curlew and the burrowing owl. Forty percent of the critical mule deer range would be grazed under seasonal use. Land treatments would result in short-term adverse affects but in the long term would be beneficial. Fisheries and aquatic species would be adversely affected or show only slight improvement over present conditions, because of little improvement in riparian habitat condition.

No change would occur in projected recreation visitor days for fishing or big game hunting, but a ten percent increase would occur in upland game hunting. No changes in visual resource management (VRM) classes would be expected. Of the known cultural sites, 91 percent would be adversely affected due to increased livestock numbers.

Ranch income changes over the long term would amount to +$141,000. Net present worth of regional income changes would be +$1.3 million. Long term employment would increase by 10 jobs as a result of the Proposed Action. The ranching community would have a strengthened feeling of social well being.

Consequences of the Increased Livestock Use Alternative. Increased soil erosion is projected for 34 percent of the allotted acreage with rates declining on only 25 percent. Estimated sheet erosion rates would increase by .04 T/A/Y over the present rates - to .73 T/A/Y. Areas with sufficient recommended watershed cover would drop from 64 percent to 49 percent of the allotted area. Significant deterioration in water quality and in watershed condition near perennial streams would occur.

Vegetative production over the long term would increase by 34 percent. Significant improvement in range condition and trend would result under this alternative. There would be no change in overall vegetative cover. Riparian vegtation would decline in condition. Two sensitive and one proposed threatened plant species would be adversely affected.

A shortage of 1,111 AUMs for mule deer would occur over the long term. Livestock utilization of shrubs on critical mule deer winter range would be above 20 percent resulting in declining carrying capacity for deer in these areas. Late fall and early spring grazing would continue on critical mule deer range and on antelope range as under the Proposed Action. Seasonal use would continue on less than one percent of the critical range. Ground-nesting

birds would be more susceptible to nest desertion and trampling. Waterfowl, furbearers, fisheries, and other riparian species would be adversely affected by further deterioration of riparian vegetation and water quality. Critical sage grouse habitat would be adversely affected by a 15 percent increase in the vegetative allocation to livestock. Land treatments would occur on critical mule deer winter range (45%), critical mule deer summer range (66%), and critical sage grouse nesting/brood-rearing habitat (36%) resulting in long-term adverse affects. Proposed water developments would benefit most species.

A decrease in projected recreation visitor days would occur for fishing (10%), upland game hunting (10%), and mule deer hunting (20%). There would be moderate impacts on visual resources with 1,621 acres of Class II and 2,434 acres of Class III being lowered one VRM class. Increased livestock numbers would adversely affect 94 percent of the known cultural sites.

Long-term ranch income changes would amount to +$304,000. The net present worth of changes in regional income would be +$2.6 million. An additional 20 jobs would be added to the job market over the long term. A strengthened feeling of social well being would be felt by the ranching community.

Consequences of the Existing Stocking Level Alternative. The rate of soil erosion would decrease on 51 percent of the allotted acreage and increase on three percent. Estimated sheet erosion rates for the area would fall to .64 T/A/Y while acreage with recommeded watershed cover would increase from 64 to 74 percent of the area. Water quality and watershed condition near perennial waters would not change from the current status.

A ten percent increase in vegetative production would occur over the long term. Improvement in range condition and trend would occur, but it would be considerably less than in Alternative A or B. Vegetative cover would not change from the present percentage of 43. Riparian vegetation would not change in condition with 70 percent remaining in the fair or poor class.

Forage requirements for big game would be met, though late fall and early spring grazing would continue to suppress forage production on 82 percent of the critical mule deer winter range, 86 percent of the critical mule deer summer range, and all antelope range. Seasonal grazing use would continue on 71 percent of the critical mule deer range. Current upland game populations would be maintained, but adverse impacts such as nest desertion and trampling presently occurring, would continue. Riparian areas would continue to be heavily grazed, resulting in no change or minor adverse impacts on associated species - waterfowl, furbearers, fisheries, river otter. Minor adverse impacts on big game and upland game would result from land treatment maintenance.

Recreation visitor day projections would remain static. No change would occur in visual resource management classes. The present downward trend in condition on 94 percent of known cultural resources sites would continue.

There would be no change in rancher incomes under this alternative. The net present worth of changes in regional income would be +$89,000. No jobs would be added to the employment section over the long term. Ranchers would have a strengthened feeling of social well being.

Consequences of the Reduced Livestock Use Alternative. Soil erosion rates would decrease on 85 percent of the area and increase on one percent. Estimated sheet erosion rates would decrease by .19 T/A/Y with the overall rate projected at .50 T/A/Y. Areas with sufficient watershed cover (60% or more) would increase from 64 percent of the area to 80 percent. Improvement in water quality and in watershed condition near perennial streams would occur.

Only a two percent increase in vegetative production would occur because no new land treatment or treatment maintenance would be done. Trend and condition on native range would improve significantly, but they would decline

on seedings. A three percent increase (to 46%) in vegetative cover would result under this alternative. Riparian vegetation would improve - significantly on the 43 percent being fenced, minimally on the remaining 57 percent.

Big game forage requirements would be met. Changes in period of use would benefit all antelope range and 90 percent of the critical mule deer summer range. Seasonal use would continue as under the existing situation. Reduced livestock numbers would result in improved habitat for upland game though the lack of land treatments and maintenance would cause some loss of sage grouse because of sagebrush stands becoming dense and overgrown. A 36 percent reduction in allocation would occur on critical sage grouse habitat. Riparian habitat would improve for upland game, waterfowl, fisheries, and other associated species where fencing occurs, but would show only minor improvement in other areas. Wildlife projects would benefit all species.

Projected recreation visitor days would increase under this alternative: fishing (5%), upland game hunting (15%), and mule deer hunting (10%). VRM classes would not change. The downward trend in condition of cultural resources would continue, but reduced livestock use would slow the rate on 94 percent of the known sites.

Long-term ranch income changes would amount to -$187,000. Changes in regional income would result in a net present worth loss of -$2.1 million. A loss of 11 jobs would occur over the long term. The ranching community would feel a reduced sense of social well being.

Consequences of the No Livestock Grazing Alternative. Under this alternative, the potential soil erosion rate would decrease on 91 percent of the allotted acreage with no areas showing an increase. Estimated sheet erosion rates would drop from .69 T/A/Y to .64 T/A/Y. Watershed cover of 60 percent or more would occur on 82 percent of the EIS area, up from the present 64 percent figure. Water quality would improve significantly, as would watershed conditions near perennial streams.

Vegetative production would increase by two percent, the same as under the Reduced Livestock Use Alternative. Range condition and trend would improve significantly on native range, decline significantly on seeded range. Vegetative cover would increase to 47 percent (up 4%). All riparian vegetation would improve significantly because of the removal of livestock.

Mule deer and antelope forage requirements would be met. All livestock-related conflicts (forage utilization, nest trampling) would be eliminated. Improved riparian habitat and water quality would benefit fisheries, waterfowl, furbearers, and other species which utilize these areas. Initially, population increases would be expected for most species. Over the long term, though, some species would decline in population because of various habitats becoming overgrown and choked with dense vegetation. This results in less productive habitat and less desirable nesting sites (for waterfowl, long-billed curlews, western burrowing owls).

Increases of ten percent in fishing, five percent in upland game hunting, and five percent in mule deer hunting would occur in recreation visitor day numbers. More visual diversity and contrast would result under this alternative, but no VRM class changes are anticipated. No livestock-related impacts on cultural resource sites would occur.

Rancher income, over the long term, would be -$540,000. Net present worth changes in regional income would be -$6.4 million. Thirty-five jobs would be lost over the long term. A reduced sense of social well being would occur in the ranching community with many ranchers having to seek outside employment to subsidize income, consolidate, or sell.

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CONSULTATION AND COORDINATION ON THE DRAFT

The Twin Falls Livestock Grazing Environmental Impact Statement Draft was filed with the Environmental Protection Agency and released to the public on January 26, 1982. An Addendum correcting a number of errors in the Draft EIS was released to the public on February 16, 1982. The public review period ended March 26, 1982.

A public hearing on the draft was held on February 25, 1982, at the Twin Falls City Hall. The hearing was attended by 50 people, 23 of whom presented oral testimony on the adequacy of the DEIS. BLM responses to the substantive portions of this testimony are presented in this final.

Approximately 450 draft statements were distributed for review. From this review a total of 55 letters were received. All letters have been reproduced in this final, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters.

In most cases, only comments pertaining to the adequacy of the DEIS--the analysis as distinct from the actions analyzed--are formally answered in this document, but all comments will be taken into account when it comes time to make final decisions regarding rangeland management in the Twin Falls EIS area.

An Errata Sheet found at the back of this document specifies text changes resulting from public and internal review of this document.

REVIEWERS AND RESPONDENTS

The following list identifies all agencies, organizations, and individuals to whom copies of the draft EIS were sent. All on the list were requested to comment on the adequacy of the statement. Many on the list had already contributed to development of the statement. Those individuals, agencies, and organizations presenting oral or written comment are denoted by an asterisk (*).

Elected Officials, Federal

Senator James McClure
Senator Steven Symms
Congressman George Hansen

Federal Agencies

Department of Agriculture
- Animal & Plant Health Inspector
- Economics, Statistics, and Cooperative Service
- Office of the Secretary
- * Soil Conservation Service
- U. S. Forest Service

Department of the Interior
- Bureau of Indian Affairs
- Bureau of Land Management--Boise Field Solicitor's Office
- * Bureau of Reclamation
- * Fish & Wildlife Service
- Geological Survey
- * National Park Service
- Office of the Secretary, Regional Environmental Officer

Department of Justice

*Environmental Protection Agency

National Advisory Council on Historic Preservation

Elected Officials, State

Honorable John V. Evans
Governor, State of Idaho
Deputy Atty. General, State of Idaho
Senator John M. Barker
Laird Noh
Representative Lawrence Knigge
Noy Brackett
Ralph Olmstead
T. W. Stiver

State Agencies

Bureau of Mines and Geology
*Dept. of Fish & Game
*Dept. of Lands
Dept. of Parks & Recreation
Dept. of Water Resources
Dept. of Health & Welfare, Division of Environmental Services
Idaho Bureau of Community Affairs
Idaho Public Utilities Commission
Idaho School Board Association
*Idaho State Clearinghouse
Idaho State University Library
State Historic Preservation Officer
University of Idaho Extension Service
Extension Range Economist
Extension Range Specialist
University of Idaho
Department of Range Sciences
Department of Wildflife Sciences

Local Government

Mayor, City of Buhl
Castleford
Filer
Hansen
Hollister
Kimberly
Murtaugh
Twin Falls
Twin Falls City Planning & Zoning
Twin Falls County Agent
Twin Falls County Commissioners
Twin Falls County Planning and Zoning Commission

Organizations

Ada County Fish and Game League
American Fisheries Society
American Mining Congress
Balanced Rock Soil Conservation District
Committee for Idaho's High Desert
Fish Breeders of Idaho, Inc.
German Short-hair Pointer Club of Magic Valley
*Idaho Cattlemen's Association
Idaho Chapter of The Wildlife Society
Idaho Conservation League
Idaho Environmental Council
Idaho Mining Association
Idaho Motorcycle Club
Idaho State Historical Society
Idaho State Snowmobile Association
Idaho Trail Machine Association
Idaho Wildlife Federation
Idaho Wool Growers Association
Independent Petroleum Asociation
League of Women Voters
*Magic Valley Bowhunters
*Magic Valley Cattlemen's Association
*Magic Valley Fly Fishermen
Magic Valley Gem Club
National Audubon Society
National Outdoor Coalition
National Wildlife Federation
Natural Resources Defense Council
NW Federation of Mining Societies
OT YO KWA - Bowman
Public Lands Council
Ralston and Associates
Region IV Development Association
Sierra Club
Snake River Alliance
Snake River Council Boy Scouts of America
Southeast Idaho Rod & Gun Club
Twin Falls Chamber of Commerce
*Twin Falls Gun Club
Twin Falls Soil Conservation District
Wilderness Society
*Wildlife Management Institute
Wildlife Society

Individuals

*Ralph Andrews
Jose Barinaga
Ralph Baughman
Clinton Bean
Virginia Becher
Bob Bell
*Clyel Berry
Joseph E. Black
*Craig R. Blewitt

*Dick Bonamarte
*Birchie V. Brown
Wallace Brown
Lou Bucklin
Jim Bulkley
Terry Butler
Doc Callen
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Gale Chambers
Roger and Coral Clark
*Ray Clayton
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Thomas Courtney
*David Crockett
*Delean Crown
*Mike Crown
*Ralph Crown
*Wayne Crown
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*Gary G. Deitrick
*Jim Deitrick
*Lyle Deitrick
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Lud Drexler
Jerry Duffy
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*Gene L. Glenn
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Elmo D. Ison
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*J. Robin Kinsey
Maurice Klaas
*Craig T. Krale
Alex Kunkel
Sharon LaMiller
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David Lutz
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Abe and Shirley McCoy
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*Chris Montgomery
*Jerry Montgomery
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*Carl Nellis
Dr. Julian O. Nickolson
*Harold G. Olson
Mel Oppliger
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*Elmer Parrott
B. L. Patrick
Jim Patrick
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Emery Peterson
Ron and Donna Peterson
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Art Rathburn
*James Ratzloff
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Ernest Romans
Fred Rose
Ted Sandmeyer
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Lee D. Satterwhite
Don, Gerald & Jim Scarrow
Lester Schnitker
*Tom Sharp
*Dan H. Shewmaker
*Glenn E. Shewmaker
*Lloyd E. Shewmaker
Roy B. and Melissa Smalley
Dr. William E. Southern
Reuel Stayner
*Ron Stokesberry
H. E. Taylor

Gerald Theener
Charles W. Thompson
Charles Trost
David Tvrdy
Ron Watters
Erich Wegener
*Jack Wendling
*Mike Werner
Harry E. Wilson
Steve Woodland
Jim Woods
Raymond Zagata
Don Zuck
All grazing permittees in the Twin Falls EIS Area
* William J. Brockman
* Charlotte Crockett
* Jones Corporation (8 signees)
* Arthur Kaster
* Floyd Kaufman
* William L. and Wilmoth Kinsey
* Bruce Kunkel
* Vernon Lassen
* Victor W. Nelson
* Gerrit W. Peters, President, Pleasant Valley Grazing Assoc.
* Norman Schnitker
* W. T., Williams, Incorporated (5 signees)
Burley District Grazing Advisory Board Members
* William J. Brockman

Burley District Advisory Council Members
* Mark Moorman

Other

Auto Phone Corp.
Buhl Herald
Clear Springs Trout Co.
Farm Bureau Insurance
Farm Bureau Insurance Co.
Golden Valley Land & Cattle Co.
High Country News
Idaho Farmer - Stockmen
Idaho Power
Kimberly School District, Ag. Shop
KMVT Channel 11
Mountain Bell Engineering Dept.
Mountain States Telephone & Telegraph Co.
Production Credit Association
Salmon River Canal Co., Watermaster
The Institute of Ecology, Indianapolis
*Twin Falls Bank & Trust Company
Twin Falls Canal Co., Watermaster
Twin Falls Times-News
Union Oil Company of California
Utah Power and Light Co.
Will's, Inc.
Winn & Co.

COMMENTS AND RESPONSES

1

MOORMAN RANCHES

February 6, 1982

Mr. Nick Cozakos
Bureau of Land Management
Route 3, Box 1,
Burley, Id 83318

Dear Nick:

I wish to commend you on the effort you have put forth on the Twin Falls Grazing EIS. I believe several specific points merit comment.

The EIS has been scaled down so that it does not intimidate the reader. Although containing fewer pages than past EIS's, I have found sufficient information on biologic, social and economic factors to enable an adequate evaluation of the merits of each of the alternatives.

I find that Alternative A (Proposed Action) does a good job of balancing the need to protect the soil and vegetation resource with the social and economic needs of livestock operators. This multiple use approach enhances all resources while adding to the stability of the County's agricultural base.

I note from Table 2-3, Alternative A, that the proposed long-term forage allocation for seven allotments is below the six year average licensed use level. Although these seven allotments contain less than one percent of the total forage that would be allocated over the long term, seven livestock permittees and their families would be adversely affected. Considering this impact on people, I urge the Bureau to explore all possibilities of gaining additional AUMs from new land treatments and rangeland projects in these seven allotments.

In conclusion, I feel you should be commended both for providing an informative yet less formidable document, and for saving the taxpayer considerable money through a reduction in the number of pages.

Thank you for the opportunity to review this draft environmental statement.

Sincerely yours,

Mark Moorman

Mark Moorman

2

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774

DANIEL A. POOLE, President
L. R. JAHN, Vice-President
L. L. WILLIAMSON, Secretary
JACK S. PARKER, Board Chairman

February 25, 1982

Mr. Nick James Cozakos
District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakos:

The Wildlife Management Institute is pleased to comment on TWIN FALLS, LIVESTOCK GRAZING ENVIRONMENTAL IMPACT STATEMENT, DRAFT; Idaho.

2.1 The plan is not satisfactory for wildlife. Wildlife provisions are minimal and do not change present degradations of critical habitat such as winter range or riparian zones to any degree. Worse, they do not even describe, let alone correct, the damages done to wildlife habitat by the tremendous seedings done in an attempt to control sugar beet leaf hopper.

This planning unit now has 103,834 acres in crested wheat grass, mostly very large blocks on the north and west sides. This is 46.5 percent of the unit. Additional treatment and seeding (13,554 acres) will bring the total to 52.5 percent. This is the largest mono-culture we have yet seen and is quite unacceptable for wildlife. Instead of increasing the so-called "Mid-Grass (seeding)," efforts should be under way to create some diversity within the unit to meet FLPMA requirements. The above data are buried in the text and maps. A forthright history of past management should be included in the impact statement.

The plan starts off with a 5 percent livestock increase. Only 7 percent (to be fenced) of the riparian zones will improve, yet the text describes the adverse effects of grazing on the riparian zones very well.

2.2 No effort is made to improve diversity; on the contrary, water developments and seedings will spread livestock to areas presently ungrazed and thus decrease overall diversity.

2.3 Winter ranges will be even more abused. Thirty percent of critical deer winter range is scheduled for spraying. (p. 78) In addition, livestock will use 20 percent of the remaining winter range shrubs. (p. 9)

2.4 We assume that Idaho Fish and Game furnished the long range forage allocation for wildlife. It seems very low to us, and should be increased if proper diversity is provided.

DEDICATED TO WILDLIFE SINCE 1911

2

Mr. Nick James Cozakos -2- February 25, 1982

2.5 This is truly a livestock grazing plan with only token recognition of wildlife. It continues the past emphasis on livestock and agriculture, rather than correcting past errors by vegetative habitat improvement.

Some specific comments follow:

p. IV. Seven percent of the riparian area will be improved by fencing; (p. 6) the remainder will be "maintained." This is not satisfactory management of habitat that is becoming one of the major conservation issues.

2.6 p. 11. What is the total cost of these livestock improvements? How much will grazing fees and taxes return to the U.S. Treasury?

p. 37, Watershed. This is a good description of what happens to riparian zones that are grazed by livestock. Why not do something about it; fence or make occasional-use riparian pastures? On page 61 (first paragraph) under the preferred alternative, it is stated, "The proposed increase in allowable livestock use would overshadow these factors, thus increasing livestock use on riparian areas, resulting in their accelerated degradation." How does this reconcile with "maintain" riparian on p. 6? 2.7

p. 61. Condition will not change.

p. 67. There will be little change in trend.

2.5 (cont.) All of these factors show the overall detrimental effects far outweigh any good effects for wildlife. Coupled with past massive mono-culture of crested wheat and no corrective action, the effects on wildlife are devastating.

We urge a complete revision of this plan to meet FLPMA, Department Regulations, and to conform to the land management standards of the late 20th century.

These remarks have been coordinated with William B. Morse, the Institute's Western Rapresentative.

Sincerely,

Daniel A. Poole

Daniel A. Poole
President

DAP:lbb

Response to Letter No. 2

2.1 The Twin Falls Livestock Grazing Environmental Impact Statement is not a plan. It is only the grazing portion of a larger multiple use plan developed for the Twin Falls Planning Unit. A number of additional wildlife recommendations, which do not affect or are not affected by the grazing management program are included in the multiple use plan.

2.2 Efforts to improve wildlife species diversity will be done by spreading out the water sources, both livestock and wildlife waters, to areas where water is not presently available.

Through proper planning of vegetative treatments, the increased edge effect, leave areas and seed mixtures which include a variety of grasses, forbs and shrubs, will help to increase both wildlife and vegetative species diversity.

2.3 Page 78, paragraph 5, states that seven percent (corrected from 30 percent in the Addendum distributed February 16, 1982) of critical mule deer range is scheduled for chemical spraying. This includes both critical summer and critcal winter ranges. Paragraph 3 states that in the short term, proposed manipulations would adversely affect approximately seven percent of critical mule deer winter range. Pages 75 and 76 further discuss grazing on critical mule deer range.

Any grazing systems for domestic livestock on mule deer winter ranges would be set up to limit livestock utilizaiton of important winter forage shrubs to less than 20 percent of the annual growth. Allowing livestock utilization of important winter forage shrubs can increase the vigor and production of browse species, particularly if the utilization occurs in the late spring and early summer (Jensen et al. 1974, Smith and Doell 1968). By limiting utilization to less than 20 percent of the annual growth, an ample forage supply is assured for the mule deer population in these critical winter ranges. The key shrub in the EIS area is bitterbrush.

2.4 Idaho Fish and Game cooperatively furnished present and future big game population numbers by allotment. Forage allocation was then determined as follows:

$$\frac{\text{800 Pounds of Forage Consumed Per Month for Cattle}}{\text{150 Pounds of Forage Consumed Per Month for Mule Deer}} = \text{5 Mule Deer/AUM}$$

Deer Months = Number of Deer Per Season X Season Length in Months

$$\text{No. of AUMs Required for Deer} = \frac{\text{No. of Deer Month}}{\text{5 Deer/AUM}}$$

800 Pounds = 1 AUM

2.5 As stated in 2.1, this is only a portion of a larger multiple use plan which contains a number of additional recommendations to improve wildlife habitat. Numerous wildlife and livestock waters, in addition to those

already constructed, are proposed for areas presently without a water supply. Wildlife will be able to utilize all these sources. Forage is being allocated to meet wildlife needs for projected big game populations (1990) determined by the Idaho Fish and Game. All proposed treatment areas where seeding is proposed will include a seed mixture appropriate to meet both livestock and wildlife needs. In addition, Alternative D was designed to maximize non-livestock values without complete disruption of the livestock industry.

2.6 The proposed costs of all developments are identified in several tables found in Chapter 2. These figures are summarized in Table 2-14. An analysis of the local economic impact of these expenditures is shown in Chapter 4 - Environmental Consequences, on pages 96-100. Further analysis of the national economic effects has been reserved for the benefit/cost analysis of each proposed Allotment Management Plan (or individual projects). These plans will be developed, as appropriate, following the final decisons on rangeland management in the EIS area.

2.7 Currently, a small amount (18 enclosures containing less than ten percent) of riparian vegetation is fenced (wildlife enclosures, study plots, etc.). An additional seven percent of the riparian vegetation in the EIS area is to be fenced under the Proposed Action. Also, a significant amount of the riparian vegetation occurs in allotments proposed for grazing mangement system implementation. Following the final decision on rangeland management in the EIS area, a monitoring plan will be developed and implemented to monitor the condition of riparian zones throughout the EIS area. If conditions do not improve under the management approach identified in the final decision, then additional measures (i.e., fencing, initiation of occasional use areas) may be required. According to the EIS (p. 60), the impact of the Proposed Action on riparian vegetation is: "Included with the Proposed Action are 10.9 miles of fencing which would protect 35.5 acres of riparian vegetation from livestock use. The remaining 445.5 acres of such vegetation would continue to be adversely affected by heavy livestock grazing and trampling. Grazing management systems would reduce the impacts somewhat, but livestock would still tend to congregate in and around riparian zones."

3

John V. Evans, *Governor*
Daniel T. Emborg, *Administrator*

State Capitol Building
Boise, Idaho 83720

DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS

February 26, 1982

Nick James Cozakos
District Manager
Burley District Office
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakos:

The Idaho State Clearinghouse has completed its review on the TWIN FALLS LIVESTOCK GRAZING ENVIRONMENTAL IMPACT STATEMENT - SAI #00126540. The following agenices were contacted for their review and comment:

Region IV Development Association
Department of Parks and Recreation
Department of Fish and Game
Idaho Historical Society
Department of Lands
Department of Water Resources

At the time of sign-off, comments have not been recieved from the reviewing agencies. All late comments will be forwarded to your agency.

Thank you for letting us assist you with the review of this project. If you have any questions, do not hesitate to contact either myself or Lois Wade at 208-334-4718.

Sincerely,

Gloria Mabbutt

Gloria Mabbutt, Coordinator
Idaho State Clearinghouse

GM:lw

IDAHO
A Land For All Seasons

4

United States Department of Agriculture
Soil Conservation Service

Room 345
304 North 8th Street
Boise, Idaho 83702

March 3, 1982

Mr. Mike Haase
Team Leader
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Haase:

Thank you for the opportunity to review the Twin Falls Grazing Environmental Impact Statement. It is unfortunate that an addendum was necessary as this made review of the document somewhat difficult and time consuming.

Our only comment would be that riparian habitat is extremely important to many species of wildlife and also for water quality. These areas must receive management consistent with meeting these needs. This is true irrespective of the alternative selected.

We agree with your proposal to develop integrated ranch plans through a cooperative, coordinated approach.

We commend you on many of your objectives. They are indeed a challenge if they are to be met in the specified time frame.

Sincerely,

Amos I. Garrison

Amos I. Garrison
State Conservationist

5

MARCH 8, 1982

MR. SCOTT ANDERSON; T.F. ENVIRONMENTAL IMPACT STATEMENT

THE PAST HISTORY OF PUBLIC LAND MANAGEMENT HAS MADE IT NECESSARY FOR THE PUBLIC TO MAKE THEIR VIEWS KNOWN.

IT IS OBVIOUS THAT MORE PEOPLE USE THE PUBLIC LANDS FOR RECREATIONAL REASONS THAN THE FEW WHO TAKE ADVANTAGE OF IT FOR THEIR OWN BENEFIT.

WE MUST PROTECT THE WILDLIFE IN THOSE AREAS AT ALL COST AND WE MUST DO ALL WE CAN TO ASSURE THAT OUR WILDLIFE WILL CONTINUE TO GROW IN GREATER NUMBERS.

I SUPPORT ALTERNATE D, FOR REDUCED LIVESTOCK USE,

YOURS TRULY -
Ray Clayton

6

March 10, 1982

Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, ID 83318

Attention: Scott Anderson
Magic Resource Area Manager

Dear Sir and any Concerned Personnel:

My complements and sympathy on all the work that has gone into the Environmental Impact Statement Draft we have received.

I feel in reading the different proposals that you have offered fair consideration to both livestock and sportsmen.

I approve of your proposed action A or B. However in these proposals it appears there are some plans indicated that would mean more personnel and the fencing of fifth fork which I am opposed of.

6.1 I would like to see the turnout date not be a hard and fast rule, but a time, after inspection, that shows the grass and water are available for the cattle. The feed depends so much on the weather both spring and fall. I realize numbers cannot be juggled from year to year but time and use can.

6.2 I question archeological sites on the B.L.M. as the Indians camped hunted and lived on the entire area.

Thank you for the opportunity to express my opinions.

Respectfully,
Charlotte Crockett
Charlotte Crockett
Rancher

Response to Letter No. 6

6.1 Turnout dates are not now nor will they in the future be "hard and fast."

6.2 While it is true that the Indians utilized the entire EIS area, the evidence of this utilization is not evenly distributed over the landscape. Areas of transient use are not recorded as cultural resource sites and are not set aside for protection. Discrete areas of concentrated use are recorded as cultural resouce sites and are afforded protection under various laws and regulations. Since a large number of cultural resource sites, both historic and prehistoric, have been destroyed over the years, it is important to protect those remaining on the public lands.

7

United States Department of the Interior
NATIONAL PARK SERVICE
Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

1202-03(PNR-E)
DES-82/2

March 11, 1982

Memorandum

To: Bureau of Land Management, Burley District
Attention: Scott Anderson, Magic Resource Area Manager

From: Regional Director, Pacific Northwest Region

Subject: Review of Twin Falls Livestock Grazing Draft Environmental Impact Statement, (DEIS), Twin Falls County, Idaho (DES-82/2)

We have reviewed the subject draft and believe that recreation resources are satisfactorily addressed. However, we do have comments on cultural resources.

7.1 The DEIS states that 138 cultural resource sites have been identified in the affected area, and that none of them are now listed in the National Register of Historic Places. There is no indication, however, whether these sites might be eligible for the Register.

7.2 In addition, the DEIS indicates that if the preferred alternative is selected, 91 percent of the known cultural resource sites would be adversely affected. The DEIS includes no proposals for mitigating these impacts.

These concerns and others must be addressed in compliance with 36 CFR 800 Preservation of Historic and Cultural Properties. This compliance process should begin as early as possible in the planning stages of any Federal project.

Thank you for the opportunity to comment.

Daniel J. Tobin, Jr.

Response to Letter No. 7

7.1 Until intensive evaluations of the cultural resource sites in the EIS area are made, no definitive statement of National Register eligibility can be made. Evaluations would generally include an assessment of not only the surface remains, but also of the nature and extent of subsurface remains. Until such time as these evaluations are conducted and definitive statements can be made, it must be assumed that the sites possess information important to history or prehistory and are thus eligible for inclusion in the National Register.

7.2 The discussed impacts to cultural resource site are in the form of generalized trampling impacts projected from increased stocking rates. The exact location and extent of these projected, generalized impacts is impossible to determine. There are few, if any, steps that can be taken to anticipate and mitigate these impacts. Removal of all cattle from the rangelands, protection of sites by fencing or burial, or salvage of the information contained in the sites are all possibilities. However, efforts in these directions are not realistic. Specific, project-related impacts can and will be mitigated, as pointed out on pages 11 and 96. Rerouting pipelines, springhead fencing, and ground stabilization are examples of mitigating measures that will be used on a project-specific basis. In some instances, such as springhead fencing, project work may even lead to beneficial impacts.

8

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

REPLY TO ATTN OF: M/S 443

Scott Anderson, Magic Resource Area Manager
Burley District Office
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Anderson:

Twin Falls Grazing EIS - Draft

The Region 10 office of the Environmental Protection Agency has reviewed the subject DEIS. It is a well written, well organized document that examines a reasonable set of alternative methods for achieving a balance among the area's resource demands. The proposed rangeland management program incorporates many of the practices recommended in a joint EPA/BLM publication, Livestock Grazing Management and Water Quality Protection (November 1979), and should lead to improved water quality in the EIS area. Fecal coliform problems will persist, however, and may still reflect a potential health hazard to recreationists in the area. More attention to this problem would enhance the quality of the Final EIS.

Table 4-2 indicates that even with the proposed rangeland management program fecal coliform levels will exceed Idaho state standards in at least twelve perennial streams. Elsewhere in the text (p.38) it states that temperature standards are currently exceeded in six streams and, under the preferred alternative, this trend could continue (p.56). Better definition of this water quality problem would help to assess the health
8.1 risk to local recreationists and aquatic life. The most important information that should be provided in the Final EIS, is how far downstream the fecal coliform and temperature problems persist. Other seemingly critical information would include:

- o downstream water uses
- o areas of highest recreational use
- o occurrence of any known pathogens
- o dissolved oxygen levels

8

8.1 (cont.)
- o highest and average fecal coliform and temperature levels (in relation to standards)
- o details of the proposed water quality monitoring program (e.g., sample points, methods, frequency and parameters)

8.2 Insofar as little documentation exists to show the water quality benefits of the measures included in the proposed alternative (p.54), EPA would appreciate receiving periodic updates on the results of the monitoring program. These may be referred to Mr. Ray Peterson in EPA Region 10's Environmental Services Division at the above address (telephone FTS 399-1193 or 206-442-1193). Such data would be most helpful in EPA's continuing water quality planning activities. In the interim, areas of high recreational use should be posted to discourage the public from drinking surface waters unless boiled for at least ten minutes.

8.3 One other area that should receive some attention in the Final EIS involves other types of farming in the area. Certain fruit and vegetable crops, including grapes and tomatoes, are highly susceptible to damage from the herbicide 2,4-D. If any such crops are grown in the EIS area they should be identified and steps should be taken to insure that spray drift will not reach them. Also, BLM should use a low volatile form of 2,4-D which has a lower air quality impact, in general, than the more volatile forms.

EPA appreciates the opportunity to review this EIS. It has been rated LO-2 (LO = lack of objections, 2 = more information requested). We would be glad to discuss our concerns and suggestions with you and your staff. To arrange such discussions you should contact Mr. Dick Thiel, our Environmental Evaluation Branch Chief, at (FTS) 399-1266.

Sincerely,

John R. Spencer
Regional Administrator

Response to Letter No. 8

8.1 Precise quantification of the extent to which downstream fecal coliform and temperature problems persist would be difficult to assess with our existing public land sampling data.

Although interpolations might be made from existing data (Twin Falls Unit Resource Analysis, Table .45A7d), there would be no way to assess the influence that private land uses have on these streams once they leave public land, unless additional sample stations were put in on private land. On streams where State of Idahhao water quality standards for temperature and bacteria levels are exceeded on public land, it can be assumed that standards are exceeded when the stream leaves public land boundaries (if a sample station was not located at this boundary). However, the magnitude of and distance which the standards are exceeded can only be accurately assessed with additional sampling downstream from public land.

Downstream water use consists predominantly of irrigated agriculture. The area receiving the highest amount of recreational use is the Salmon Falls Dam Recreation Site. Additional recreational use occurs along Shoshone Creek and both above and below Salmon Dam. Dissolved oxygen levels are listed in Table .45A7d of the Twin Falls URA. All stream sample stations showed dissolved oxygen levels that met State of Idaho standards. The highest and average fecal coliform and temperature levels, in relation to standards, are indicated on Tables .45A7c(1) and .45A7d of the watershed portion of the Twin Falls URA. Details of the proposed water quality monitoring program will appear at a later date in the monitoring plan.

8.2 The EPA will be put on our mailing list to receive results of our water quality monitoring program.

8.3 The types of farm crops grown in the EIS area include wheat, sugar beets, potatoes, alfalfa, peas, corn, oats, and barley. Neither grapes nor tomatoes are grown commercially in the EIS area. Should an alternative be chosen in which the spraying of 2,4-D is used as a tool in range management, an Environmental Assessment (EA) would be prepared on each project area prior to implementation. Such an EA would address volatile spray drift impacts and recommend appropriate mitigations to reduce air quality impacts.

.45A7a(1) Summary of Water Quality Criteria and State of Idaho Standards

Category	Parameter	Criteria	Use
Temperature	Temperature D°C	13° max. average daily 9°	SP
Dissolved Oxygen	Concentration	6 mg/l min.	CB
	Percent Saturation	90% saturation min.	CB
pH	pH	6.5 min. 9.D max.	CB
Bacteria	Facal Coliform	5D/1DD ml	PCR
Trophic	Nitrata	.30 mg/l-N max.	CB
	Total Phosphorus	.D5 mg/l-P max.	CB
	Ortho-Phosphorus	.025 mg/l-P max.	CB
	Total Ammonia	.20 mg/l-N max.	CB
	Total	.04 mg/l-unionized max.	CB
Aesthetic	Tubidity	25 JTU max.	
Solids	Suspended Solids or Sediment	8D mg/l max.	CB
	Dissolved Solids	5DD mg/l max.	I
	Conductivity	750 micromhos max.	I
	Alkalinity	600 mg/l max.	I
Inorganic Toxicity	cadmium	10 ug/l max.	O
	chromium	5D ug/l max.	O
	copper	20 ug/l max.	CB
	lead	3D ug/l max.	CB
	mercury	.2 ug/l max.	CB
	zinc	1DD ug/l max.	CB
	boron	75D ug/l max.	I

* The most restrictive standard ia liated

Key
SP = Salmonid Spawning
CB = Cold Water Biota
I = Irrigation
O = Domastic
PCR = Primary Contact Racreation

Water Quality Sample Stations

Stream Site	Sampling Period	CFS	Specific Conductance	pH*	H_2O# Temp.	Dissolved O_2mg/1 @	Hardness $CaCo_3$	Volitile Non-Filterable	Filterable Residue	Non-Filterable Residue	Fecal $ Coliform #/100 ml.
Snake River	Winter			7.7	0°	13.4			low	0	3
Near Burley	Summer			8.9	22°	9.3				24	60
Fifth Fork	Summer	2.2	150	8.5	21	7.7	70	<2	120	8	210
Rock Creek	Fall	- -	160	7.9	19	7.5	74	<2	141	10	0
Lower McMullen Creek	Summer	.72	90	7.7	19	8.5	29	11	103	12	- -
	Fall	.55	90	6.6	12	8.6	34	<2	117	12	<2
Upper McMullen Creek	Spring	4.7		7.6	8°c		22	2	99	10	2
	Summer	.84	85	8.0	19	8.1	28	14	108	50	67
Cottonwood Creek	Spring	1.9	117	7.0	8.0	9.9	36	<2	126	106	3
downstream from USFS	Summer	3.1	70	7.7	21	7.2	24	12	109	14	110
Green Creek	Spring	.71	48	6.5	7.0	9.3	20	<2	114	4	<1
USFS & BLM Border	Summer	.0001	68/104	3.4	19	7.95	32	4	117	72	36,000
Upper Deep Creek	Spring	.034	82	7.4	13	8.2	36	<2	108	4	210
	Summer	.02	145	6.5	16	9.4	56	< .2	160	21	15
Lower Cottonwood Creek	Spring	.;81	80	7.6	9.5	9.2	32	2	116	28	<1
Deep Creek tributary	Summer	.18	99	7.6	14.5	8.4	36	10	118	40	87
Upper Cottonwood Creek	Spring	.75	78	7.4	7.0	10.0	34	3	115	16	<1
	Summer	.32	78	7.9	14	8.4	40	10	119	19	117
Upper Shoshone Creek	Spring	- -	37	7.2	5°	9.2	18	3	81	38	39
Site A	Summer	1.1	155	8.1	18.5	6.5	58	2	150	9	1,200
Shoshone Creek	Spring	- -	38	7.2	7°	9.1	16	2	89	39	26
Site B	Summer	2.1	160	8.0	22	7.2	60	2	163	6	950
Big Creek	Spring	2.7	112	7.0	8°	8.7	46	4	90	20	420
Horse Creek	Spring	.05	300	7.8	15	7.3	118	4	202	21	<1
Below Dam	Summer	- -	210	9.9	22	10.8	64	6	180	40	120
Hot Creek (mouth of)	Spring	2.82	241	8.1	18	9.1	94	2	163	26	70
Shoshone Creek	Spring	- -	42	7.3	7.5	10	22	<2	90	33	10
Below Hot Creek	Summer	8.0	190	8.4	22	11.2	- -	<2	151	2	
Shoshone Creek	Spring	- -	43	7.3	6	10.6	26	4	103	46	29
Site D	Summer	19	180	7.1	18.5	7.5	80	<2	146	<2	20
Shoshone Creek	Spring	- -	48	7.3	6.2	9.2	34	4	103	53	2
Site E	Summer	11	180	8.4	19	7.2	89	<2	141	<2	120,000
Shoshone Creek	Spring	- -	51	7.5	10	9.3	26	4	101	50	8
Site F	Summer	8.3	170	8.5	15	8.0	76	12	151	41	1
Upper Mule Creek	Spring	.59	59	6.8	10	8.1	26	<2	81	<2	4
	Summer	.02	85	6.5	18	7.4		11	105	22	1
Lower Mule Creek	Spring	.44	18	7.6	16	8.1	28	3	87	17	<1
	Summer	.02	110	7.4	34	7.3	28	12	89	32	20
Twin Springs	Spring	.07	72	6.8	9°	8.2	44	<2	109	5	70
Salmon Falls Creek	Spring	- -	87	7.35	10	9.2	48	52	119	294	54
Below Fish barrier	Summer	- -					94	<2	174	94	0
Salmon Falls Creek	Spring	- -	89	7.4	9°	9.6	52	27	131	344	150
Above Dam	Summer	22	245	7.9	19	7.5	108	8	197	10	0
Salmon Falls Creek	Spring	- -	89	7.4	9	9.6	74	6	140	8	3
Below Dam	Summer	17	210	6.0	23	7.5	60	6	149	16	<1
Salmon Falls Creek	Spring	6.35	145	8.4	9.5	11.4	80	7	139	11	2
Near Sec. 18	Summer	18	160	7.6	14	9.2	82	<2	147	13	100
Salmon Falls Creek	Spring	6.12	158	7.6	8.3	9.4	82	8	142	18	<1
at Lilly Grade	Summer	16	190	7.7	23	8.2	80	2.7	135	27	120
Salmon Falls Creek	Spring	0 0	620	8.3	19	9.5	292	8	516	40	43
Near Banbury	Summer	22	750	7.9	20	7.4	306	9	662	37	31

* pH for aquatic life should be between 6.5-9.0.

\# Cold water fisheries require a maximum of 13°c. for spawning and an average daily water temperature not exceeding 19°c.

@ Dissolved Oxygen must be at least 6 mg/1.

$ Fecal Coliform cannot exceed 50/100 ml for contact recreation.

9

DUCK SPRINGS HEREFORD RANCH

HOME OF GOOD CATTLE SINCE 1928

STAR ROUTE
TWIN FALLS,
IDAHO 83301

BRUCE AND JOAN KUNKEL
OWNERS AND OPERATORS
PHONE 655-4275

Mar 12, 982

Nick Jane Kozakos
Bureau of Land Management
Rt 3, Box 1
Burley, Idaho 83318

R.E. Twin Falls
E.I.S. Draft

Dear Nick,

In view of the world food situation and the rate at which prime farm land in the United States is being withdrawn from food production it is my opinion that every acre in the country should be used to its highest potential.

These western range will play an increasing amount of importance in the production of red meat because the farm land is becoming too valuable for other uses to be only grazed.

Since the demand for lean meat is increasing we are seeing more use for pasture to carry these cattle to heavier weights before a short time in the feedlot. Food production should carry a very high priority and should be promoted. Therefore livestock grazing on public lands should be greatly expanded and, under proper management, this can be done along with the concept of multiple use.

Sincerely,
Bruce Kunkel

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Route 3
Jerome, ID 83338
11 March 1982

Mr. Nick Cozakos
Bureau of Land Management
Route 3 Box 1
Burley, ID 83318

Re: Twin Falls Livestock Grazing EIS Draft

Dear Mr. Cozakos:

I have reviewed said document. Although I have not been to all areas covered by this EIS, I have seen a substantial number of them in the past few years.

Your preferred alternative (Alternative A) is unacceptable to me and I urge you to reconsider your decision and select an alternative which portrays a better "land ethic". The primary reason I disagree with Alternative A is that the stated objective is "to prevent deterioration of soil, vegetation, and related resources" (p. 5) when I think you should be trying to improve soil, riparian areas, etc. From what I've seen in the area, there are many places where soil loss is too high, riparian areas are severely impacted, overgrazing is evident, etc.

I also have doubts about your being able to meet the stated objective for Alternative A since you propose a substantial increase in livestock AUM's. My impression is that the area is already being impacted by too much livestock use. Many riparian areas I've seen are in deplorable condition and any increase in AUM's will make a bad situation worse.

Another objection I have to Alternative A is that nearly all "improvements" are for livestock (some are mistakenly assigned wildlife benefits when I think they would be detrimental or neutral to wildlife). You are also proposing to remove brush from several areas which I know are important mule deer wintering areas. Brush removal on such areas would severely impact deer wintering there. Many proposed treatment areas are also important sage grouse
10.1 habitats. Also you are proposing late season livestock grazing in several allotments where deer winter. Important wintering areas for deer should not be grazed by livestock in fall or winter. I've seen heavy use of shrubs by cows in August so would recommend that livestock grazing be terminated 31 July on major deer winter ranges.

Lastly, Alternative A is unacceptable to me because, as you correctly state, "aquatic wildlife habitat would continue to be adversely affected, because, under the Proposed Action, livestock would still tend to heavily utilize riparian areas...and streambank erosion would continue" (p. 84). Riparian habitats are important to all wildlife, not just aquatic animals, in this

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semi-arid ecosystem. You also note that several "...species associated with riparian areas would be adversely affected by concentrated livestock use" (p. 87).

These and other statements and proposals in this EIS clearly demonstrate that the driving force behind the Proposed Action is livestock and that wildlife and other values do not receive adequate (fair) consideration.

Alternatives B and C are unacceptable for many of the same reasons given above. Alternative E is really not a viable alternative.

That leaves Alternative D as the only one I could support because in your words the objective "...is to maximize non-livestock uses and values...without complete disruption of the social and economic conditions associated with livestock husbandry on public lands..." (p. 24). Alternative D demonstrates the "land ethic" appropriate to a public resource management agency because soil erosion would be reduced, riparian areas would receive some reprieve from excessive use, habitat diversity would increase, plant vigor would improve, and land treatments which produce monotypes would be curtailed. Although Alternative D is better than the others, it is not ideal. For example, livestock use would still occur in fall on some deer winter ranges, some riparian areas would still be severely impacted, spring grazing would still interfere with nesting birds, fawning activities, etc.

In summary, I conclude that the only Alternative covered in this EIS which presents anything near a balanced approach to multiple use management is Alternative D. Therefore, I urge you to adopt Alternative D as your Proposed Action rather than Alternative A.

Respectfully submitted,

Carl H. Nellis

Carl H. Nellis

Response to Letter No. 10

10.1 Under the Proposed Action, 82 percent of the critical mule deer winter range will be grazed after September 30. The livestock utilization of important winter forage shrubs would be limited to less than 20 percent of the annual growth on mule deer winter ranges under the Proposed Action, regardless of when said utilization occurs. If late spring or early summer utilization occurs, the result can be increased vigor and production of the important winter browse species (Jensen et al. 1974, Smith and Doell 1968). And by limiting yearly livestock utilization of these species to less than 20 percent, an ample forage supply is assured for the mule deer population using these critical winter ranges.

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United States Department of the Interior
BUREAU OF RECLAMATION
PACIFIC NORTHWEST REGION
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 043-550 WEST FORT STREET
BOISE, IDAHO 83724

IN REPLY REFER TO: PN 150

March 16, 1982

To: Burley District Office, Bureau of Land Management, Burley, Idaho

From: Regional Environmental Officer, Boise, Idaho

Subject: BLM Twin Falls Livestock Grazing Environmental Impact Statement, Idaho (OES B2-3)

The subject statement has been reviewed by appropriate members of our staff, and we have no objections to the content of the document. Please let us know if we can be of further assistance in the review process.

John R. Woodworth

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Route 1, Hollister
Twin Falls, Idaho 83301
March 17, 1982

Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sirs:

Regarding the Twin Falls Livestock Grazing Environmental Impact Statement:

Having reviewed the five proposals, we favor Alternative A.

Alternative A is a logical plan for us. Provisions have been made for wildlife as well as livestock.

Orson Jones
Orson Jones

Frances Jones
Frances Jones

Loren Jones
Loren Jones

Gail Jones
Gail Jones

John Henstock
John Henstock

Ilene Henstock
Ilene Henstock

Roger Jones
Roger Jones

Gail Jones
Gail Jones

13

March 16, 1982

Nick James Cozakos, District Maneger
Bureau of Land Management
Route 3, Box 1
Burley, Ideho 83318

Deer Mr. Cozekos:

Thsnk you for the opportunity to comment on the Twin Falls Draft Livestock Grezing EIS(Environmental Impect Stetement). Following are comments on the vegetation section of the EIS:

13.1 1.-A deficiency exists in the prediction of future vegetetion impects due to the implementetion of renge treatments end grazing systems in the EIS aree - there is no discuasion of pest range treetments and grazing systems. A logicel extension of the results of these pest menegement practices in the EIS eree could be used to predict future impects under similer types of treetments end systems. According to pege 24 of the EIS, 104,466 acres of public land in the EIS aree ere presently under either a rest-rotetion or deferred-rotation grezing system. Page 69 of the EIS indicates thst 32,954 ecres of treetments currently exist. Pleese discuss the successes end/or failures of these pest grazing systems end renge treetments and relate them to the prediction of impects for future grezing systems end treetments in chapter 4. How do the experiences of these past grezing systems end treetments support the predicted vegetetion improvement in teble 4.3 - en increase of good condition renge of 200 percent under elternetive A (21,434 ecres to 42,917 ecres); end teble 4.4 - en increese in good snd excellent condition range of 42 percent (76,031 ecres to 108,165 acres)? Have you obteined similer long-term results from your

* 2 *

13.1 (cont.) previously-implemented range treetments end grezing systems?

2.-I am concerned over the velidity of the predicted increeses in vegetation condition due to the implementetion of grezing systems. The use of rest-rotetion or deferred-rotation grazing systems is, es you know, standerd in most BLM districts, and in almost every EIS they are presented es e meens for improving renge condition. Your EIS cites reseerch done by Gibbens end Fisser, 1975 [1]*(p. 64) end Hormey, 1970 [2] (p. 8) in supporting vegetation improvement due to grazing systems that provide relief from continuous use. Additionel support for rest-rotetion and deferred-rotetion grazing systems often comes from Hormey and Talbot, 1961 [3]. I would like to scrutinize some of the reseerch that provides the besis for the theory of rest-rotation grazing, since it is so universelly presented in the BLM es improving range condition.

Hormey, 1961 [3] originelly presented his theory of rest rotation grezing from studies on the Hervey Velley cettle allotment on Lessen Netional Forest in Northeastern Celifornia. He steted the following:

> " Selective grezing, therefore, is one of the mein ceuses of renge deterioretion, end the besic problem is to chenge the grazing pettern so thst peleteble forege species can be meintained on the most heevily grezed renge area. . . Under rest-rotetion grezing, stocking is based on the production end use of herbege from ell the aveileble forege species end not on the key species slone. Under this system, degree of use on plents does not heve the same importance aa under continuous seesonel grazing, because grezing is limited to e comperatively short time end is always followed by rest plenned to be long enough to overcome the hermful effects of grezing. . . Further, under rest-rotation grezing little attention is paid to clessifying

* Numbers in brackets refer to entries in the bibliography.

plants according to palatability to determine forage production and stocking. . . Species rated low in palatability are often grazed as closely as species rated high." (pp. 32, 33-34) " Fairly heavy stocking is desirable in rest-rotation grazing. . . A fairly high stocking rate forces greater use of the less palatable forage species and the less accessible grazing areas. . ." (p. 35)

Hormay concluded his report with the following statements:

"A practical test of the system is now in progress on the Harvey Valley cattle allotment of the Lassen National Forest. Since results from this test are not available, the merits of rest-rotation grazing cannot be fully evaluated at this time."

As you can see, the 1961 Hormay report did not provide proof that rest-rotation grazing is more beneficial to vegetation than moderate, continuous grazing. We must look elsewhere for proof.

The studies at Harvey Valley allotment in Northeastern California were continued through the 1970's. In 1974, Ratliff and Reppert [4] reported on the study, and their results are extremely suprising. Based on data collected from 1965 to 1969, the following conclusions were stated:

"Continuous grazing, therefore, appears to be more effective in controlling competing vegetation than it is damaging to Idaho fescue."

". . . Idaho fescue can apparently maintain its vigor and reproduce under moderate, continuous grazing."

"It appears, however, that range managers cannot key seed production into a set program of rest-rotation grazing."

"Further, the full use treatments did not reduce nor did full-season rest improve Idaho fescue vigor on the Harvey Valley (rest rotation) plots." (p. 449)

It is my opinion, based on the research I am citing, that predictions of vegetation improvement from rest-rotation and deferred-rotation grazing systems cannot be scientifically supported. This is clearly evidenced by Ratliff's and Reppert's conclusions, which are directly

opposite of some of the premises Hormay put forth in his 1961 and 1970 discussions of the "theory" of rotational grazing.

As I stated earlier, the Twin Falls EIS supports an expected vegetation improvement from implementation of grazing systems by research done by Gibbens and Fisser, 1975 [1]. According to the EIS, Gibbens and Fisser " found that an increase in livestock carrying capacity of six percent could be expected through implementation of systems that provide relief from continuous grazing." (pp. 64-65 of EIS) I challenge the author of this section that Gibbens' and Fisser's work supports <u>any</u> increase of livestock carrying capacity due to the implementation of grazing systems. The results of Gibben's and Fisser's study are unreliable in predicting grazing system response because of the fact that both range treatments and a 25 percent cut in livestock use occurred at the start of the study, at the same time the grazing systems were implemented.(see p. 5 of study) Thus, it is unclear whether the increase in carrying capacity was due to the grazing systems, the range treatments, the cut in livestock use, or all three. 13.2

I would like the author of the vegetation section of the EIS to comment on the following research in justifying his expected vegetation improvement due to implementation of grazing systems: 13.3

- Hyder and Sawyer, 1951 [5], in a 11-year study of the effects on vegetation of season-long vs. rotation-deferred grazing systems in a mixed sagebrush-bunchgrass plant community, found that the density of grasses had increased to a greater extent under season-long grazing by the end of the study period, than under the deferred-rotation grazing systems.

13.3 (cont.)

- A 5-year study, done by Currie, 1976 [6], found that systems of rotational grazing use did not influence herbage yields, basal areas, or plant densities of perennial bunchgrasses. Currie stated that "No season or system of grazing was any more efficient than others, including complete protection, in promoting recovery. Thus instituting a complex rotation or management system is questionable management practice for promoting improvement or recovery of pine-bunchgrass ranges." (p. 448)

In discussing the use of specialized grazing systems, Stoddart, Smith, and Box, 1975 [7], stated that "There is little doubt that grazing systems result in better distribution of livestock and more uniform utilization of the range. Their beneficial effect on vegetation is less clear . . . From the data on hand it cannot be categorically stated that a rotational-grazing system will invariably improve the range or give greater livestock production than moderate, continuous seasonal grazing." (p. 297)

I will appreciate your serious response to the points I have raised in this comment, in light of section 1502.24 of the Regulations for Implementing NEPA (43 FR 55978-56007, November 29, 1978), which states that "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements."

3.-Table 4.3 shows that 98,034 acres of rangeland are in fair or poor ecological condition, and table 4.7 shows that 170,868 acres are in static or declining trend in the EIS area. Alternative A of the EIS proposes primarily range treatments and adoption of

rotation grazing systems to improve this rangeland. Why has not a lowering of stocking levels been considered to improve vegetation condition in this "preferred" alternative? The research clearly shows that allocation levels are the primary factor which produces long-term vegetation response, and that proof of improvement from rotation grazing systems is questionable. (See comment No. 2.) Frischknecht, 1978 [8], in a study of influences of grazing, climate, fire, and other disturbances on a sagebrush/grass range, stated that "Results showed that intensity of grazing exerted greater influence on vegetal changes than the systems of grazing." (p, 634). Martin, 1978 [9], stated that " No grazing system can succeed if the range is overstocked."(p. 15). In Stoddart, Smith, and Box, 1975 [7], we find the following: "Hickey(n.d.) [10] reviewed 115 papers reporting results of grazing-system trials. He began his conclusions thus: "The maximum number of cattle that can safely be carried on any square mile of territory is the number that the land will support during a poor season. Whenever this rule is ignored there is bound to be loss." (Smith, 1895) [11]. This "rule" is of utmost importance in grazing management." Finally, the following is from Valentine, 1978 [12]:. . . (A) misconception is that specialized grazing systems are the long-awaited panaceas that will permit ignoring the other principles of grazing management. On the contrary, the evidence is overwhelming that they cannot replace the need for proper stocking rates, the use of species of grazing animals adapted both to the terrain and to plant species available on the site for grazing, and the use of a composite of many techniques for distributing grazing." 13.4

13.4 (cont.) The ignoring of allocation levels as a causal agent for the existing vegetation condition, and the absence of any discussion of adjusting

13.4 (cont.) allocation levels to improve future vegetation condition in the "preferred" alternative is not sound, scientific range management. Modifying allocation levels should be the starting point when improvement of vegetation is being considered.

4.-In the two-treatment rest rotation grazing system outlined in appendix A, a pasture would receive use after flowering two years out of three. The third year would be a year of rest from grazing. My concern on this system is whether the need of perennial grasses to store carbohydrate reserves in the predormancy period is provided. I am assuming that use would occur after flowering but before dormancy. Defoliation in the predormancy period of grasses, the period after flowering, is extremely detrimental because it is at this period when growth is slow and the carbohydrate reserves which have been used for earlier growth and flowering are being restored. Defoliation causes the grass to utilize its stored reserves in an attempt to regrow before dormancy. It often happens that there is insufficient time for the plant to regrow to the point that it can restore its depleted reserves. The result is that the plant enters the dormancy period with an inadequate reserve level, a condition which reduces the vigor of the plant, and, if continued, will result in its death. The "regrowth" I am referring to is not regrowth due to fall precipitation, but regrowth before the spring and early summer growing season has ended. It is my opinion that the optimum season of use of a perennial grass is after range readiness, yet early in the season, followed by rest before the dormancy period. This allows the plant to regrow and restore its carbohydrate reserves after defoliation, so that vigor of the plant is not affected. This is assuming however, that the plant is not overutilized when it is grazed.

It is important to keep the problem of proper season of use in perspective. The need to utilize the plant at the proper season is negligible in relation to the need for the plant to be utilized at the proper level, and the need to utilize the plant after range readiness. Use of perennial grasses when they are dormant is, of course, not harmful.

Support for the premises I have outlined in the above discussion can be found in the enclosed literature study. Some of the supporting references are: Weinmann, 1961 [13], Cook, 1966 [14], Kinainger and Hopkins, 1961 [15], Trlica and Cook, 1971, 1972 [16,17], McCarty and Price, 1942 [18], Blaisdell and Pechanec, 1949 [19], and Mueggler, 1967 [20].

13.5 5.-Many of the positive vegetation effects projected from treatment of sagebrush-dominated rangeland in the EIS area may be absent by the year 2000, due to the reinvasion of sagebrush. Therefore, the vegetation impact predictions due to range treatments are optimistic. That sagebrush reinvasion and related perennial grass suppression may occur within 10 to 20 years after treatment is supported by several researchers: Hendrick et al., 1966 [21], Johnson, 1969 [22], Johnson and Payne, 1968 [23], and Bleak and Miller, 1955 [24].

6.-The impact tables in chapter 4 give the appearance of highly accurate impact prediction. However, in reading the introduction to the chapter (p. 53), one finds that the "long term" period to which the tables are apparently referring covers the period of 1990 to 2000. 13.6 Are the highly quantified impacts to be interpreted as occurring at the beginning, middle, or end of the ten-year period?

Impacts that specific must be tied to a specific date, i.e. year. Otherwise a range of quantified impacts should be shown. Only in one instance could I find a table indicating a specific year. (Table 4.3 is at the year 2000 according to p. 64.) The ludicrousness of the highly quantified impacts representing a ten-year period is revealed when one examines the change in vegetation that can occur in a ten-year period.

I understand that at the present time it is politically not expedient to reduce livestock use, even when range conditions may indicate a reduction is necessary. However, prediction of vegetation response is not a political process. Professional range managers have a responsibility to be as scientifically accurate as possible in predicting the vegetation response of their land management decisions.

I am looking forward to your sincere consideration of my comments on the Twin Falls Draft Grazing EIS.

Sincerely yours,

J. Ratliff

J. Ratliff
1388 Garrison, # G107
Lakewood, Colorado 80215

Enclosure

BIBLIOGRAPHY

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APPENDIX ~~RA-9~~ A

RESEARCH BASIS FOR DEVELOPMENT OF THE PROPOSED FALL REST SCHEDULE

The fall rest schedule described in Chapter 2 is constructed around the assertion that grazing in the pre-dormancy period of plants is the most detrimental period of use. The premises which this assertion are based on are as follows:

1. The period after flowering and before dormancy (the pre-dormancy period) is the time when most plants are rapidly accumulating carbohydrate reserves, which were lowered during the earlier growth and flowering periods.

2. Defoliation late in the season causes plants to enter dormancy at a lowered carbohydrate rcserve level, unless sufficient time is available for regrowth.

3. The more regrowth which occurs after defoliation and before dormancy, the higher the carbohydrate reserve level will be as the plant enters dormancy.

From these premises, it can be seen that late season defoliation is most detrimental because insufficient time remains for regrowth and subsequent restoration of carbohydrate reserves before dormancy. Summer grazing is the next most detrimental period, followed by spring grazing, and grazing during plant dormancy, which is the least harmful period of use. In the rest schedule, periods of late season use are followed in subsequent years by rest at earlier periods. This is to periodically allow time for regrowth and restoration of carbohydrate reserves in the grazing cycle.

The findings of numerous researchers support the premises which are the foundation of the fall rest schedule (stated above). The specific research which supports each premise will be discussed and summarized below. Most of the literature references are based on clipping studies rather than grazing studies. A discussion of the differences between grazing and clipping and the validity of clipping studies is at the end of this section.

Premise # 1

The period after flowering and before dormancy (the pre-dormancy period) is the time when plants are rapidly accumulating carbohydrate reserves which were lowered during the earlier growth and flowering periods.

McCarty (1938) stated that the concentration of carbohydrate reserves in both herbage and basal organs of grasses is inversely related to the rate of herbage growth. The accumulation of carbohydrate reserves is delayed, therefore, until most of annual herbage is produced (late in the season).

Weinmann (1961), in a literature survey of the seasonal trends of carbohydrate storage in grasses, found that TAC (total available carbohydrate) changes in the storage organs show, in general, a similar pattern in most species of grasses: TAC decrease in both concentration and amount during the formation of new shoots, more particularly during spring, and increase during maturation, which is indicative of their function as "reserve substances". Weinmann noted that in a few instances no typical seasonal changes were detected, which could be due to imperfections in the sampling procedure or in the growth habit and behaviour of the species concerned. (Woods et al. 1955; Daitz 1954; Barnes 1960; Weinmann and Goldsmith 1948; Hiepko 1959; Thaine 1954; Neiland and Curtis 1956; Weinmann 1946, 1947, 1948) in Weinmann 1961.

Mooney and Billings, in a study of the seasonal carbohydrate reserve fluctuations of three alpine plants (Saxifraga rhomboidea, Polygonum bistortoides, and Geum turbinatum) found that at fall dormancy the carbohydrate content is at a very high level in the underground storage organs. Early shoot growth utilizes considerable quantities of storage reserves. After this period there is a rapid accumulation of reserves in rhizomes and roots, reaching a peak again late in the alpine growing season. All of this activity was condensed into a period of a relatively few weeks.

McConnell and Garrison (1966) in a study of the seasonal variations of available carbohydrates in bitterbrush, found that carbohydrate reserves declined during the early growing season and remained at a relatively low level during flowering, rapid twig growth, and seed formation stages. After seed formation, reserves began to accumulate and build up markedly until leaf fall.

Cook (1966) stated that in general, the normal trend of seasonal carbohydrate balance in the storage organs is similar for most perennial plants. In the majority of species, the minimum reserves in the storage organs occur during early vegetative growth. After initial growth has produced considerable leaf area, carbohydrates are synthesized in excess of growth requirements. At this time some plant species slowly begin to

replenish the reserves, while in other species the reserve remains at a relatively low level until the later stages of maturation. When plants approach maturation, carbohydrate storage reaches its peak.

Additional references which support Premise # 1 are as follows: Donart (1969); Kinsinger and Hopkins (1961); Welch (1968).

Premise # 2

Defoliation late in the season causes plants to enter dormancy at a lowered carbohydrate reserve level, unless sufficient time is available for regrowth.

Trlica and Cook (1971), in a study of the defoliation effects on the carbohydrate reserves of eight desert species (Artemisia tridentata, Artemisia arbuscula var. nova, Atriplex confertifilia, Atriplex falcata, Eurotia lanata, Oryzopsis hymenoides, Stipa comata, and Sitanion hystrix) found that autumn reserve storage decreased as the time between defoliation treatment and normal quiescence (dormancy) lessened. Plants which were defoliated during rapid growth (about May 10) or near maturity (about July 1) had little regrowth and consequently had little photosynthetic tissue present for carbohydrate sunthesis during late summer; whereas plants which were defoliated during quiescence (about November 12) the previous year, or during early growth (about April 1) had more regrowth and greater carbohydrate storage by quiescence.

In an unrelated study, Trlica and Cook (1972) found that when Russian wildrye (Elymus junceus) and crested wheatgrass (Agropyron cristatum) were defoliated during quiescence the previous year, or during early growth the same year, only small reductions in autumn TAC (total available carbohydrates) storage occurred. However, when the plants were clipped at anthesis (peak flowering) and again at maturity, substantial reductions in autumn TAC shores occured. Plants from these three treatments had little chance for regrowth before autumn frosts and consequently had little photosynthetic tissue for carbon dioxide assimilation and carbohydrate storage during the normal storage period.

McCarty (1938) in a study of the relation of growth to the varying carbohydrate content in mountain brome, stated that continuous heavy grazing at or after seed maturity during the autumn storage period, would not only prevent normal storage of carbohydrates, but would also stimulate further herbage growth. This stimulated growth would be produced at the expense of the carbohydrates already stored, resulting in further depletion of carbohydrates, and the plant would enter the winter period with diminished stores.

Owensby et al. (1970), in a study of the effect of burning and clipping on big bluestem (Andropogon gerardi) reserve carbohydrates, stated that the later in the growing season that clipping occurred, the lower were reserves for use during winter dormancy and subsequent sprino regrowth.

Several researchers have found that fall cutting of alfalfa can kill or injure the plants because of loss of ability to harden and of freezing tolerance. Such harvests remove the plant's leaf area, which is important in the synthesis of carbohydrates. Later regrowth draws on energy reserves that cannot be replenished in the time left before winter dormancy. Plants low in energy reserves may develop a lower level of winter hardiness than plants high in reserves (Smith 1964; Levitt 1972; Grandfield 1935; Mark 1936; in Voight 1975).

Additional references which support Premise # 2 are the following: McCarty and Price (1942); Mueggler (1967); Reynolds and Smith (1962).

Premise # 3

The more regrowth which occurs after defoliation and before dormancy, the higher the carbohydrate level will be as the plant enters dormancy.

In a study of the response of mountain grassland vegetation to clipping at different times in the growing season, Mueggler (1967) found that the species were most harmed by clipping during the period from flower stalk formation to seed ripening. Mueggler's findings also supported those of McCarty and Price (1942) for Bromus carinatus, Agropyron trachycaulum, and Geranium viscosissimum in the mountains of Utah. They determined that the harmful period was just prior to and during the early part of the period when the plants stored carbohydrates in their roots and crowns. Adequate storage of carbohydrates at the beginning of dormancy is essential to survive the dormant period and to sustain the first flush of growth in the spring. Removal of foliage too late in the season to allow substantial regrowth prior to the storage period and too early for adequate storage to take place before the onset of dormancy is most harmful (McCarty and Price 1942; in Mueggler 1967).

In a study of the effects of herbage removal at various dates on the vigor of bluebunch wheatgrass (Agropyron spicatum) and arrowleaf balsamroot (Balsamorhiza sagittata), Blaisdell and Pechanec (1949) found that as clippings were made later and later in the growing season, there was less and less opportunity for regrowth and subsequent photosynthesis. This trend continued until, toward the end of the growing season, no regrowth was possible. Clipping at this time left the plant with no means of supplementing its food stores during the period when most of

the storage normally takes place. Thus, after the date when substantial regrowth is impossible, and before maturity, complete herbage removal can be expected to most seriously impair plant vigor (Blaisdell and Pechanec 1949).

Cook (1971) and Trlica and Cook (1971) conducted a study of the effects of season of defoliation on the vigor and carbohydrate reserves of several desert plant species. They found that greatest reductions in autumn carbohydrate levels of the studied species were found when defoliation occurred during rapid growth about May 1 or when plants approached maturity about July 1. The more regrowth attained by a species after defoliation, the greater the carbohydrate reserve replenishment.

In contrast to the above findings, Donart and Cook (1971) found that defoliation of both grasses and forbs early in the season when carbohydrate reserves are low is considerably more detrimental than defoliation late in the season when carbohydrate reserves are high if, however, there is ample opportunity for regrowth before fall dormancy occurs. This reaffirms the importance of regrowth to restore depleted carbohydrate levels. An important criterion in this study is that defoliation in the late season did not occur until after reserves had been restored. Thus, the plants were at maximum vigor. Defoliation while the plants were actively restoring the reserves probably would have been more harmful.

Trlica and Cook (1972), in a study of the influences of development and defoliation on carbohydrate reserves of crested wheatgrass and Russian wildrye, concluded that autumn reserve stores were directly related to the amount of new growth produced after being defoliated.

Effects of Grazing vs. Clipping

The majority of the literature support cited in this appendix is based on clipping studies rather than actual grazing studies. Clipping, however, is a valid technique to reflect the general physiological response of plants to grazing. The actual effects of clipping on range plants may be more or less detrimental than grazing, depending on circumstances, according to White (1973). Grazing may be more detrimental than clipping if selective grazing removes all herbage from some plants and not others, because ungrazed plants take available nutrients and water away from grazed plants. However, grazing may be less detrimental than clipping if grazing leaves ungrazed tillers on a plant while removing others, thus allowing for the transfer of carbohydrates from ungrazed to grazed tillers. McKendrick and Sharp (1970) pointed out that plant responses may result from soil moisture effects from soil compaction by livestock. These responses would not be evident in clipping studies.

Response to Letter No. 13

13.1 First, 103,871 acres of treatments currently exist as indicated on page 36. The 32,954 acre figure on page 69 refers to the proposed maintenance acreage.

Second, the increase in good conditon range in Table 4.3 is 100 percent rather than 200 percent as stated in your letter.

Seven allotments with native range in the category described on pages 64-65 as having potential for improvement through grazing management are currently operated under grazing systems. We have pre-system condition data on only one of these allotments. The deferred rotation system was developed on the Ridge Allotment under a cooperative management agreement between BLM, SCS, and the permittee in 1970. The allotment was inventoried prior to finalizing the plan. The results of this inventory showed that all native range on public land was in fair condition. No reductions in allowable use were initiated nor were any land treatments undertaken. As shown in Table 3-3 of the EIS, the 1979 SVIM inventory showed 5,147 acres (78 percent) in good condition, 1,140 acres (17 percent) in fair condition, and 315 acres (5 percent) in poor condition. These improvements are greater than those predicted in the EIS.

Twenty allotments currently managed under grazing systems contain areas of native range and are in the 8 to 12 inch precipitation zone. Dominant species in the native range are big sagebrush, Sandberg bluegrass, and cheatgrass as described on page 65. No data is available on the condition of any of these areas prior to initiation of grazing systems. Comparison of these areas with adjacent areas which receive continuous grazing shows no difference in condition.

Our predictions of improvement in native range condition from treatment came from observations of spray treatments of similar vegetation types conducted on private land in 1979. Sagebrush was not completely eradicated from the treatment areas, but was reduced sufficiently to increase the composition of grasses. Forbs in the treatment area were reduced for one growing season after treatment, but have begun to increase.

A total of 69,836 acres of seedings are used under grazing management systems in the EIS ares. A variety of deferred and rest-rotation systems are used. None of the data collected on these seedings supports any improvement in condition as a result of the systems. We have found that reinvasion of brush is inevitable and that repeat treatments are required if continued high level production of livestock forage is the objective.

Observations of controlled burns and wildfires in seedings show that seedings improve both from the removal of competing brush and from the reduction of litter which accumulates in the plant crowns.

13.2 Your are correct. The six percent increase refers to plant basal area rather than livestock carrying capacity. This figure is the result of comparing a transect run in a controlled area with one run in a grazing management system area. The controlled area showed an increase of 25 percent while the grazing system area showed an increase of 31 percent. The result is an increase in grass composition which would result in an improvement in condition as stated on page 65 of the EIS. It should be noted that no increases in livestock forage allocation were given under any alternative as a result of implementing grazing management systems.

13.3 The description of study areas in the Hyde and Sawyer paper showed that the majority of forage was produced by Sandberg bluegrass. This would appear to be similar to those areas described on page 65 of the EIS as showing no improvement through grazing systems. This similarity was confirmed by personnel from the Burns District BLM in which this study took place. It would appear that this study gives further reinforcement to the work described in Hironaka and Fosberg (1979).

The Currier study shows that rotation grazing under heavy stocking levels is no better than continuous grazing. As you pointed out on page 6 of your letter, proper stocking levels are needed to provide long term vegetative responses. Under the proposed allocations in the Twin Falls EIS no allotment, either with or without a grazing system, would be grazed at or near a level where utilization would be "self-limited by the shortness to which animals could graze the major forage plants" as described in Currier's Study Area and Methods section (pg. 446). The level of utilization reached by this method of management could be considered severe rather than heavy.

In regard to the quote from Stoddard, Smith, and Box, the Twin Falls EIS did not state that rotation grazing systems will invariably improve the range.

13.4 The allocations of forage were based on SVIM inventory results and actual use-utilization studies. These results were calculated based on biological limits of use allowed for the species involved and the seasonal dietary preference of the grazing animals present.

13.5 We are aware of reinvasion potential of sagebrush into seedings. The Proposed Action includes maintenance treatments on 32,954 acres of existing seedings to reduce reinvading sagebrush. The exact timing and extent of reinvasion is difficult to predict. As future seeding maintenance needs are identified, they will be addressed through the environmental assessment process.

13.6 The impacts were projected to the year 2000.

14

PLEASANT VALLEY GRAZING ASSOCIATION, INC.
1112 Main Street
Buhl, Idaho 83316

March 11, 1982

Nick James Cozakos, District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakes:

The board of directors of Pleasant Valley Grazing Association, Inc. wishes to go on record as supporting Alternative A of the Twin Falls Livestock Grazing Environmental Impact Statement. We would, however,
14.1 like to recommend some modifications to Alternative A. We feel that the buffer strip around the Berger seeding is not necessary. The board suggests that a few small areas of buffer in the Berger area would suffice.

Our feeling is that Alternative A will provide a good balance between wildlife and multiple use.

We recommend spraying for brush control because it is selective and leaves cover to hold moisture, check erosion and meet deer needs.

The P.V.G.A. board opposes any plan that would reduce grazing below the allocation in Alternative A.

Very truly yours,

Gerrit Peters
President

Response to Letter No. 14

14.1 A proposal to leave a buffer strip around the Berger was not discussed in the EIS. The management philosophy regarding this area is to retain existing native islands of brush at times of seeding maintenance.

15

TWIN FALLS, IDAHO 83301 1935 KIMBERLY ROAD

TWIN FALLS TRACTOR
& IMPLEMENT CO.

March 19, 1982

Mr. Nick James Cozakos, Diatrict Manager
Mr. Mike Haase, Team Leader
Bureau of Land Management
Rt. #3 Box 1
Burley, Id. 83318

Dear Sira:

After reading the Impact Statement on vegetative resource, I waa pleased to know your staff came up with a multilpe use. In my opinion the economic and environmental impact on the Region in question should be alternatives A and B, with B the number one choice. My opinion is based on the personal contact with the people and their operation in the area involved and the economic impact your decision will have all concerned.

Thanking you for your consideration, I remain.

Gene L. Glenn, President
Twin Falls Tractor & Implement

GLG:lm

16

March 19, 1982

Scott Anderson
Magic Resource Area Mgr.
Bureau of Land Management
Twin Falls EIS
Route 3 Box 1
Burley, ID 83318

Dear Mr. Anderson,

Increased livestock use in the Twin Falls Grazing Area would benefit only a few stockmen.

A very significant difference would be noticed by a multitude of sportsmen-recreation type of people if this increase is disallowed. Far too many prime areas have already been scarred forever by poor planning. As this is the number one mule deer area of our state, let's protect it to the fullest.

I therefore want to go on record as supporting Alternative D, Restricted Livestock Use.

Sincerely,

Del Carraway
483 Parkway Circle
Twin Falls, ID 83301

17

STATE OF IDAHO

DEPARTMENT OF LANDS
STATEHOUSE, BOISE, IDAHO 83720

Address reply to:
DEPARTMENT OF LANDS
SOUTH CENTRAL AREA
BOX 149
GOODING, IDAHO 83330
PHONE 934-5606

March 19, 1982

Scott Anderson, Magic Reserouce Area Manager
Bureau of Land Management
Burley District Office
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Anderson:

We have reviewed your draft, Twin Falls Environmental Impact Statement. Generally, we have no problems with the statement as it is written. However, we do want to maintain our cooperative efforts in managing State lands that are within your grazing
17.1 allotments. We want to point out our major concerns in maintaining our cooperative efforts.

Our rental rates, for grazing leases used on an exchange of use basis in the BLM allotments, are based largely on the amount of AUM's allowed for exchange of use. Any changes you make in the amount of exchange of use directly affects the income to the State endowments. Therefore, we request you include our Departments Range Managers in any proposals to change the amount of exchange of use for any State lands involved.

17.2 We believe that land exchange between the State and the BLM can be a useful tool in managing both of our lands. We would like you to address this in your statement as a means to resolve management problems and increase the benefits to the public and the beneficiaries of the State Endowment Lands.

17.3 Range improvements can be a benefit to all of the rangeland within an allotment. Some of your proposed range improvements adjoin or include State lands. Whenever possible, we would like to coordinate our efforts in accomplishing the same or a similar improvement on State lands. Often times, by coordinating our efforts both agencies can save costs on the contracts. We are requesting you to involve our agency, far enough in advance of a proposed project, to allow us time to submit the project proposal in our budget process.

We appreciate having the opportunity to be involved in cooperative management of both our lands and the opportunity to review and comment on your Environmental Impact Statement.

Sincerely,
Howard K. Kestie
HOWARD K. KESTIE
Area Supervisor

HKK:dm

cc: Natural Resource Planner

EQUAL OPPORTUNITY EMPLOYER

Response to Letter No. 17

17.1 Coordination with the Idaho Department of Lands will continue where State lands are included in BLM grazing allotments.

17.2 The consideration of land exchanges is beyond the scope of this EIS.

17.3 See Response 17.1.

18

William (Bill) Brockman
Route #2
Kimberly, Idaho 83341

March 20, 1982

Burley Dist BLM
Mr Scott Anderson

Dear Scott,

I would like to submitt my comments on the Twin Falls Environmental Impact statement. I think the TFEIS is a credit to the BLM & to all the people who spent many hours to make this information available.

At this point in time I feel I must favor Concept A in all areas. There are certain areas such as increased grazing that I favor Concept B but as to the overall plan I must support Concept A. I think concept A is more along the line of multiple use & I certainly favor that. I do not however, favor any fencing of streams until we have evidence that our
18.1 stream beds are deteriorating. I also think that deer AUM's are to high for our area. I would appreciate it if you would re-check these figures.

While livestock grazing is where I make my living I am also very interested in Fish & wildlife & watershed. I hope to pass my grazing privilege on to the next generation & will do everything in my power to protect water & soil conditions, grazing & wildlife for future generations.

18

Ours is not a business of buy & sell for the highest dollar or a rape & ruin business that will be gone tomorrow. We are here to stay, hopefully for generations to come.

It has been brought to my attention that a fish & wildlife employee was at the hearing coaching "sportsmen" to favor Concept D. No grazing. I think the Fish & Wildlife Service made a mockery of the Public hearing process. I plan to investigate this further when I am able & I intend to bring it to the attention of local legislators, Idaho Cattlemen's Assn. & the Attorney General. I think this is a dangerous conspiracy & I hope you will put little faith in their rigged testamony.

I feel on our allotment, there is a lot of room & great potential for further range development. I am looking forward to working with the BLM to accomplish this goal.

Yours truly,
Wm J. Brockman
Rt 2 Box 104
Kimberly Idaho
83341

Response to Letter No. 18

18.1 A recheck of the deer AUM's shows no change from the original figures. Deer numbers were obtained cooperatively between IDFG and BLM. See Response 56.2.

19

TWIN FALLS BANK AND TRUST COMPANY

102 Main Avenue South
Twin Falls, Idaho 83301
Telephone 208 733-1722

March 17, 1982

Mr. Nick James Cozakos, District Manager or
Mr. Mike Haase, Team Leader
Bureau of Land Management
Route No. 3, Box 1
Burley, Idaho 83318

Dear Mr. Cozakos,

It is gratifying to learn from the Impact Statement that the allocation of vegetative resource, is based on the multiple use concept. It is the undersigned's opinion that through the cooperative well managed application of this concept, much has been accomplished. My considered judgment suggests that, in light of the economic and environmental impact on the region under evaluation, only Alternatives A and B should be seriously entertained. Although my persuasion favors Alternative B, Alternative A would not be unacceptable.

My license to offer an opinion is based on many years of personal and institutional involvement in the area under study.

May I take this opportunity to commend you and your staff and all involved in the drafting of the Impact Statement.

Thanking you in advance for your consideration, I remain

Sincerely,

Curtis T. Eaton

Curtis T. Eaton, Chairman of the Board
and President

20

P.O. Box 876
Kimberly, Id. 83341
March 22, 1982

MAR 2 [illegible]

Bureau of Land Management
Route #3 Box 1
Burley, Id. 83318

Mr. Nick Cozakos:

As a sportsman and self employed custom farming operator dealing in the hay business throughout the year, I am well acquainted with the cattle industry.

I feel your proposed 'Alternative A' (preferred alternative) is the better of the alternatives, although some very weak points appear for both wildlife and cattle. I feel the following will benefit both the wildlife and the cattle:

1. More water developement especially concerning more pothole construction, as has been done in the Cassia area.
2. More fencing in the over-used creek bottom areas. (25 miles of proposed fencing is highly inadequate when considering the many miles of fishable streams.)
3. Less spraying and more railing to enhance forb and grass developement. Complete sagebrush removal conflicts with both sage grouse and deer browse useage.

In closing, I feel the wildlife have been short-changed in a couple of areas:

1. Over $5.00 spent on livestock developement as opposed to 1/5th of that spent on wild-life forage improvements.
2. Blocks of reseeding for livestock only, that is no reseed of buck brush, bitter brush, or sage brush.
3. Large block burning rather than intermix burning. An area in the Owyhee Desert area shows this intermix burning enhances new growth in the burned areas for cattle cover, and for browse for the wildlife in the untouched areas.

I would like to complement the personnel whose time and effort went into the Twin Falls Environmental Draft as it relates to both the positive and negative aspects of such a proposal. In my opinion it is the most complete and informative impact study yet to date done by the Bureau of Land Management.

I hope amendments can be made to Proposal A to increase the numbers of sage hen and deer which I have enjoyed for the past 23 years in our South Hills.

I might add that I have a B.S. degree in Wildlife and Game Management and am very familiar with the game animals and birds and their needed habitat of grasses and forage, so I am not completely unfamiliar with what I am talking about.

C. Michael Werner
P.O. Box 876
Kimberly, Id. 83341

21

Bureau of Land Management Attention: Mr. Nick Cozakos

In the proposed action of Alternative A of the Twin Falls E.I.S. Draft, one of the specific objectives is stated to be "Preserve and enhance game and non-game wildlife habitat and populations--upland game, waterfowl, fish, etc." However, after studying the proposed action, I am having difficulty seeing how this will be accomplished.

21.1 I cannot see where anything is being done to protect the streams, or develope adequate water other than the streams. How can you enhance populations when all the animals, domestic and wild have to concentrate on a few water areas? How can you enhance fish populations when the cattle have to congregate on the creek bottoms, thus causing to water to be below quality water standards?

The proposed Alternative also calls for a lot of spraying.

21.2 How does eradication of large areas of sage brush enhance wildlife habitats? It seems to me that a thinning of the sage brush would benefit the wildlife and the cattle alike to a much greater degree.

I sincerely hope that these points will be concidered in the final E.I.S.

Ron Stokesberry
RR1.2
Filer, Idaho 83328

Response to Letter No. 21

21.1 Thirteen wildlife water facilities (guzzlers) are proposed in Alternative A. Two guzzlers presently exist in the EIS area. As wildlife needs are identified in the future, additional guzzlers may be installed. See pages 16 and 17 of the Draft EIS for additional information on guzzlers. Response 28.1 discusses wildlife use of livestock water developments, existing and proposed, as well as providing information on why additional water developments were not proposed.

For a discussion of impacts on riparian areas and water quality problems, see Responses 2.7 and 7.1.

21.2 Total eradication of large areas of sagebrush does not enhance wildlife habitats. Through proper planning in the layout and design of proposed treatment areas wildlife habitat can be enhanced. See paragraphs 4 through 6, page 17. Several benefits which would occur through proper planning include an irregular treatment of the area which allows for untreated islands of native vegetation known as leave areas. These areas will increase the edge effect and provide wildlife cover. Existing trees would be avoided during treatment. Cover requirements and hunting/foraging needs of wildlife would be considered on a site by site basis. In all treatment areas to be seeded, an appropriate wildlife seed mixture would be used. For a more detailed analysis of land treatments see page 17 of the EIS.

Kimberly, Idaho (22)
March 22, 1982

Burley Dist. Office, BLM
Scott Anderson, Magic Resource Mgr.
Rt. #3, Box 1
Burley, Idaho 83318

Dear Mr. Anderson:

Concerning the draft of the EIS on The Twin Falls Planning Unit, I would suggest strong consideration be given Alternate "B" of increased livestock use.

The livestock industry in Southern Idaho provides stability to our economy. Beef is one of the most desirable food products in the United States. You are well aware of the energy efficient ability of the rumen animal in the use of a renewable resource to produce this product.

The successful rancher must be dedicated to the commitment of a long term. It is usually associated with The family type operation requiring several generations to build a economical unit.

(22)

The grazing of livestock is compatible with the existance of wildlife species. It is a natural means of fire control.

With the inevitable need for increased food production in the future, the revenue producing effects of the livestock industry, and the desireability of maintaining an environmental balance, you would be justified in adopting Plan "B" over other considerations.

Respectfully yours,

Lloyd E. Shewmaker
Route #2
Kimberly, Idaho 83341

(23)

March 22, 1982

Attention: Mr. Nick Cozakos
Bureau of Land Management
Burley, Idaho

Re: Twin Falls E.I.S. Draft

This letter represents the Magic Valley Bowhunters organization. We have an active membership of approximately fifty members.

The membership does not completely support the proposed alternative. Alternative A needs to be amended to give more consideration to wildlife.

Special consideration should be given to the mule deer winter range. It needs some improvements. We feel that water should be developed in any feasible place to remove the livestock pressure from the riparian zones. More of the riparian zones should be fenced to improve their quality. Water development is an issue that should be considered and acted on as soon as possible.

Less spraying should be done. We favor spot burning, if done in small amounts, and railing. Railing is, in our opinion, the best practice. We need the sage brush thinned not removed.

We feel the game herds in the South Hills have been on the increase and are stable. We credit this to the efforts by the B.L.M. and the local grazers.

We urge you to consider our recommendations and concerns.

Sherman Russell, President M.V.B.
162 Van Buren
Twin Falls, Id 83301
Sherman D Russell

24

Harold G. Olson
Box 285
Filer, Idaho 83328

March 21, 1882

Attention Mr. Nick Cozakoe;

I don't think Alternative A does enough for wildlife. I would like to see more water developed to spread cattle grazing out. Cattle and wildlife shouldn't have to depend on one water source over miles and miles of area. A cow can only go so far from water to feed, therefor a lot of areas are over used. Water is the key answer to the over-grazing problem.

I want more railing and less spraying. I feel railing gives a faster return of a feed source than spraying. We do not need miles of thick sage brush, nor do we need miles of grass. It needs to be a blend to benefit wildlife and cattle. Railing would help deer winter range and sage grouse nesting areas, by thinning sage brush. It would leave some protection, which is needed.

I want more positive improvement for wildlife.

Harold Olson

25

Chris Montgomery
Box AG
Filer, Id 83328

March 20, 1982

Dear Mr. Cozakos,

I am not pleased with the Alternative A, proposed action in the Environmental Impact Statement. It is an improvement, but it is still not enough to help our wildlife.

More water is desperately needed in this area. The cattle have to concentrate in the same small areas as the wildlife, in order to get their water and feed. Any water developed, would ease this situation. I am tired of seeing streams trompled, because the cattle have no other place to get their water. There should be more vegetation left on the creek bottoms left undisturbed. Fencing could be the answer. This would improve, fishing, hunting, and grazing.

I do not like spraying, because it is too drastic a measure. I favor railing, and spot burning. Railing is more benificial to both grazing and wildlife.

I sincerely hope some amendments will be made. Cattle and wildlife can live together, if land is managed properly.

Sincerely yours,

Chris Montgomery

26

Route 2
Filer, Idaho 83328
23 March 1982

Nick Cozakos
BLM
Route 3
Burley, Idaho 83318

Dear Sir:

In verbal testimony at the Twin Falls hearing on the Twin Falls Grazing EIS, I voiced preference for Alternative D from the choices offered in the documentation. However, with compromise, additions and deletions other offerings could be equally acceptable.

Alternative A offers notable benefits to wildlife but further wildlife and fisheries considerations are needed for Alternative A to be the preferred option. I would like Alternative A amended to include:

1. Additionsl water development to better spread cattle and to serve wildlife.
2. Additional and imoroved fencing to protect riparian zones and improve conditions of big game winter range.
3. Less spray and more soot railing in the Magic Common Area to control overgrown brush without drastic habitat alteration.

I would like to take this opportunity to commend you for the multiple-use consideration given in the EIS in the interests of those of us who are not permittees.

Sincerely,

Jack H. Wendling

27

March 22, 1982

Mr. Nick Cozakos
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Cozakos,

I would like to set the record straight after doing my home work. I want to withdraw my oral testimoney given on March 25th, 1982 for alternative D. I feel that the proposed alternative will be the best for all concerned.

But there should be more done for wildlife.

There needs to be more water developed to take the pressure off of the riparian zones with fencing done along these zones. Should also be more railing and spot burning and a lot less spraying with large enough areas left to give the wild game a chance to survive even in hard winters that can occur at anytime. Not having to wait 15 to 20 years for brush to grow back.

With these few considerations the Magic Resource area will be better for everyone concerned.

Thank you.

Gary G Deitrick
803 Idaho St
Filer, Idaho 83328

28

March 23, 1982

Attention:
Mr. Nick Cozakos
Bureau of Land Management
Route 3, box 1
Burley, Idaho 83318

I would like to see the final Twin Falls E.I.S. take a greater concern for our wildlife, that would in turn also benefit cattle grazers. There are several things that can be added to the proposed action that will accomplish this.

Water is of primary importance to the game and livestock utilizing their entire feeding area. Let's not cut the development of water short! The more water developed, the less the cattle and wildlife have to concentrate, and the less damage they will do to the grazing lands. This is healthier for the land and the animals.

28.1 The number of proposed structural developments for water, spread out over the 231,298 acres involved, means one new water source for an area of approximately 4,600 acres. How is this going to get cattle off the creek bottoms? That is a long way to walk to water. If we do develope enough water away from creek bottoms, we need to ensure that the cattle won't go back to their "old stomping grounds". Only by fencing these critical sections of the creeks in this area can we be sure of any success.

We must also consider the feed for both cattle and wildlife, without distroying great areas of habitat. Thinning the sagebrush distroys less natural habitat and allows for equal improvement of feed for both wildlife and cattle. I feel that the great areas proposed for spraying would have an adverse effect on wildlife's feed and habitat, and may also provide greater opportunity for soil erosion.

Let's have the best E.I.S. we can for all concerned.

Wing McCluskey
P.O. Box 727
Twin Falls, ID
83301

Response to Letter No. 28

28.1 Currently, 177 developed water facilities are available for use by wildlife and livestock (excluding wildlife guzzlers). The number of potential new water developments is limited by the availability of additional water and the topography of the public lands. All known technically feasible water developments were identified for livestock in Alternative B and for wildlife in Alternative D. Of the projects identifed in Alternative B, two wells with five troughs, one pumping station with one trough, one spring development, and one reservoir were not included in the Proposed Action due to the large expenditure of funds which would be needed to achieve relatively small benefits. All technically feasible water developments identified in Alternative D were included in the Proposed Action.

29

March 22, 1982

Mr. Nick Cozakos
Bureau of Land Management
Route 3 Box 1
Burley, Idaho 83318

Dear Mr. Cozakos,

A note concerning the meeting of the BLM on their ideas. There was some good things on alternate D but there are a few changes that were of interest to me that were not noted.

I am against any spraying unless there is no other way to handle the situation. The burning should be limited to sections--no mass burning. I think if at all possible railing should be the best way to remove any sage brush that is necessary to move.

There should be precations taken to be sure the wild life is not endangered with any operation to the birdnests& young. There should be some way to protect the creek beds from damage to the banks & foliage. As well as springs and places to get water for game & birds.

They say there is need for bird ramps on water tanks and if any help is needed to put some of them up. Just ask. I know it is quite a problem but hope I can work for everyone concerned.

Thank you.

Lyle Deitrick
Lyle Deitrick
Route 1
Filer, Idaho 83328

30

Jerry Montgomery
1645 Richmond Dr.
Twin Falls, Idaho 83301

March 21, 1982

Mr. Nick Cozakos
Bureau of Land Management
Route # 3, Box 1
Burley, Id. 83318

Dear Mr. Cozakos: Re: Twin Falls E.I.S. Draft

I do not think any of the alternatives are acceptable without some amendments. I want to retract the statement I made at the public hearing. I do not support Alternative "D". Alternative "D" does not cover the problem of stream protection any more than Alternative "A". Alternative "D" lacks good sound improvements for wildlife. I believe public land should be used by wildlife and cattle in harmony to benefit all concerned. What good is public land if it is not utilized to its full potential. Cattle grazing done properly can benefit wildlife. Less cattle grazing is a cop-out, because it really doesn't improve wildlife habitat. It leaves the habitat status-quo. Less grazing has adverse effects on the economy of our area. This benefits no one.

I could support Alternative "A" with certain amendments. I am displeased with the statement in the E.I.S. Draft, that some streams exceed State of Idaho water quality standards for water temperature and bacteria levels. This problem should be improved. Water is the key to good management in the Twin Falls E.I.S. area. More water needs to be developed by pot-hole construction, reservoirs, pipe lines, and wildlife guzzlers. More water available would spread out the concentrations of cattle and would increase the use of unused areas. Water development is important to the grazers and wildlife. I feel more stream bottoms should be fenced in critical areas, such as; Upper McMullen Creek, Upper and Lower Cottonwood Creek, Fifth Fork of Rock Creek, Upper Deep Creek and parts of Salmon Falls Creek.

In Alternative "A" there is entirely too much spraying. I feel railing in the sage grouse areas would be better and more beneficial. The sage brush needs thinned, not removed. Spot burning in these areas would also be an improvement.

30

The critical winter range for mule deer is not in real bad shape, but needs more consideration and improvement. Spot burning and railing needs to be done. The spot burning should be done in small land areas, not in excess of forty acres. I have observed deer use of burned areas. The deer seek out such areas, because of the new growth of forbs. Railing, because of the thinning process, would benefit both cattle and deer..

I would like to commend the B.L.M. on their efforts to inform the concerned sportsmen. Sportsmen appreciate these efforts.

I would like to also commend the ranchers in this E.I.S. area. They have been very helpful and show a definite concern for wildlife. With combined efforts of the grazers, B.L.M., and the sportsmen, the Twin Falls Area can be made better and beneficial to all concerned.

Very truly yours,

Jerry Montgomery

Jerry Montgomery

cc: Jerry Conley, Director Idaho Fish and Game
Representative Noy Brackett
Gary Will, Idaho Fish and Game
Bill Kinsey, Western Stockgrowers
Tom Sharp, Grazer

31

Nick James Cozakos
District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

March 23, 1982
Stan Melton
Director
Twin Falls Gun Club
Route 1
Filer, Idaho 83328

Dear Sir:

In response to the Twin Falls Grazing Environmental Impact Statement dated January 1982.

As a Farmer, Sportsman and a Director of the Twin Falls Gun Club of which there is approx. 150 active life and annual members, the following are comments and suggestions to the EIS draft and BLM management.

Of the alternatives proposed, proposed action Alternative "A" is the most acceptible with modifications, plus what further research and public input will indicate.

Vegetative Allocation; Wildlife should have a larger increase in relation to increased livestock AUM's in long range planing;

Grazing Management; A decrease in custodial land acres, include these in the management plans of the surrounding allotments where located.

Grazing Treatments; A revised study in the area's of critical upland game bird nesting and rearing area's and mule deer critical summer and winter range in relation to early and late grazing dates;

Range Development;More water the better!,development of more water would enhance wildlife, livestock and fishery's and would reduce degradation of riparian area's. Use of special directing fence's would direct livestock away from these riparian area's to developed water.

Land Treatments; Less spraying, better controlled burns, use of multiple forage seeding, more railing and seed drilling to provide edge or strips of habitat for wildlife and increased forage for livestock.

The proposed action along with comments and suggestions will increase the multiple use, economy of ranchers, recreation, sportsman and related services to these groups in the Twin Falls area. By these groups working together the multiple use concept will work. Please keep us informed. Thank you.

Sincerely

Stan Melton
Director
Twin Falls Gun Club

sm/cc
Idaho Cattlemens Assoc.
Clair Whitlock
Lawrence Knigge
Noy Brackett
Steve Herrett

32

Ralph Andrews
Route 2
Filer, Idaho 83328

Mr. Nick Cozakos
Burley District Office
Bureau of Land Management
Route 3, Box 1
Hurley, Idaho 83318

Dear Mr. Cozakos;

At the public hearing (Feb. 25) I went on record as a sportsman oppossing alternative A in favor of alternative D. However while Alternative D reduces livestock use it does very little else to improve wildlife habitat.

Although Alternativs A shows an increase in livestock grazing it does provide a few habitat improvemente. As they are currently written I can not support A or D. I feel that the answer lies somewhere between A and D.

I would like to suggest:

1. Spot burning instead of largs solid burns.
2. More railing instsad of epraying.
3. Critical wildlife areas (especially wintering range) be reserved and improvsd for that purpoee only.
4. More water developmsnt (potholes. game guzzlers, etc.).
5. Fence creek bottoms.

Reepectfully;

Ralph Andrews

33

Mr. Cozakos,
I am a rancher and a sportsman I am part owner of a corporation of which six families are involved and am speaking for the entire corporation we have BLM and Forest rights as well as nine thousand acres of private range and Farm land We are working with the Fish and Game at the present time developing more game habitat on our BLM and private land We support plan A for the following reasons
1. It provides for a increase for wildlife and wildlife habitat
2. It increases the livestock capacity helping the economy of the entire area
3. It gives ranchers that have made a living from livestock since even before the BLM started a better chance to stay in business

33

+ It will generate more money for water development and range up keep for wildlife and livestock through the livestock grazing & it develops more of the range making it less of a fire danger than Sagebrush and cheat grass which will burn off sooner or later anyway

William J Williams
Thomas Williams
W T Williams
Jef A. Williams
Wyatt Williams

34

Page 24, Alternative O. We prefer this alternative because it would provide a better balance of environmental protection and economic development. Although $35,000 would be spent for additional wildlife developments or projects, $559,667 would be saved by omitting the range developments and land treatments for livestock.

34.4 Page 32, Goal 3. The statement that Alternative O would cause economic hardship is subjective and is not supported. It should be documented, if true.

Page 33, Goal S. We consider Alternative O to be a better attempt at balancing all uses and users of the range resources. Alternative A benefits livestock use to the detriment of wildlife habitat.

Page 33, Goal 6. Alternative O would achieve this goal more effectively than the Proposed Action because of the latter's adverse effects on fisheries and riparian vegetation.

34.S Page 60, 8th paragraph. Protecting only 3S.S acres of riparian vegetation out of 481 acres seems inadequate for the preferred alternative. All riparian vegetation should be protected.

Page 61, 2nd paragraph. This alternative protects less than half of the riparian vegetation. Yet the objective is to "maximize" non-livestock use. Again, all riparian vegetation should be protected.

L. A. Mehrhoff

cc: FWS/OEC, Washington, O.C.
FWS, SE, Boise, Idaho

34

United States Department of the Interior
FISH AND WILDLIFE SERVICE
AREA OFFICE - IDAHO AND NEVADA
4620 OVERLAND ROAD, ROOM 238
BOISE, IDAHO 83705
FTS: 554-1960/COMM: 208/334-1960

MAR 24 1982

TO: Burley Oistrict Office, Bureau of Land Management, Burley, Idaho (Attn: Scott Anderson, Magic Resource Area Manager)

FROM: Area Manager, FWS, Idaho/Nevada Area, Boise, Idaho (ES)

SUBJECT: Oraft Environmental Impact Statement, Twin Falls Livestock Grazing Program, Idaho (EC 82/2)

We have reviewed the subject document and have the following comments.

General Comments

34.1 This draft environmental impact statement seems to be trying to justify Alternative A, the preferred alternative, without having defined the purpose of and need for the action. Alternative A, the Proposed Action, fails to treat fish and wildlife resources equally with livestock grazing. The statement particularly minimizes the adverse effects of the Proposed Action on riparian vegetation and aquatic habitat. A preferred alternative should show a more even balance between economic development and environmental protection. We suggest you modify the Proposed Action to include more measures for the conservation and development of fish and wildlife or design another alternative which combines the characteristics of the Proposed Action and Alternative D, Reduced Livestock Use.

Specific Comments

34.1 (cont.) Pages 1 and 2. The statement should more clearly and positively specify the underlying purpose and need to which the agency is responding. For example, it does not show a need to increase livestock use. It definitely should express the need to restore and rehabilitate resources damaged by grazing. This would help in analyzing the various alternatives.

34.2 Page S, 1st paragraph. The objective of the Proposed Action should reflect a more balanced position. If the enhancement of social and economic status is to be part of it, then the improvement of the environment should be included.

34.3 Page 6, 6th Objective. This statement is misleading and should be corrected. On page 60, the penultimate paragraph says, "The remaining 44S.S acres of such vegetation would continue to be adversely affected by heavy livestock grazing and trampling." This is not maintenance of riparian habitat. We recommend the Proposed Action include measures to protect all wetland riparian habitat. Executive Order 11990 - Protection of Wetlands (May 24, 1977) requires federal agencies to minimize the destruction, loss or degradation of wetlands.

Response to Letter No. 34

34.I According to 40 CFR Part IS02.13 Purpose and need, "The statement shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." A detailed discussion of the purpose and need is not indicative of this statement. The fact that livestock grazing is causing some resource degradation is identified with the purpose indicated as "to access these problems and alternative strategies for resolving them." Whether an increase (or decrease) in livestock use is desirable or practical is identified as a public concern (page 2). Also, specific issues of public concern are identified, overall and specific objectives for each alternative are discussed in Chapter 2, and descriptions included in Chapter 3 - Affected Environment - are intended to identify the resource problems, as well as current conditions that exist in the EIS area presently. It is these current trends, conditions, etc., which identify the reasons why the livestock grazing management program is being proposed.

34.2 Though "The overall objective of the Proposed Action is to prevent deterioration of soil, vegetation, and related sources ...," an examination of Table 2-14, page 29-31, shows numerous benefits to these resources resulting from the Proposed Action. For example, 71 percent of the public land in the EIS area is projected to have a decrease in potential soil erosion rates and there would be a I9 percent increase in the amount of vegetation in good condition.

34.3 See Response 2.7.

34.4 Data supporting the statement that Alternative O would cause economic hardship is found in the Economic section of Chapter 4 - Envrionmental Consequences (page 96-I00).

34.S See Response 2.7.

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Conservation & Education

MAGIC VALLEY FLY FISHERMEN

March 23, 1982

Mr. Nick Cozakos
Bureau of Land Management
Route #3 Box 1
Burley, Idaho 83318

Re: Twin Falls E.I.S. Draft

Dear Mr. Cozakos:

While it is very difficult to try to digest the entire contents of this draft, I would like to give some input on behalf of the Magic Valley Fly Fishers regarding stream bank erosion and water quality. The Magic Valley Fly Fishers are not anti-livestock but we do not believe an increase in livestock grazing is going to make the problem any better. We do not believe reduced livestock use would help either as this would adversely affect the ranchers.

We believe a balance should be struck to benefit all of those who would use the land and water for a living and for recreation. Something has to be done to find alternate sources of water for the cattle so they won't have to travel into the streams. This would keep the stream banks from becoming trampled and allowing the soil to shift into the water, causing added siltation. As this siltation builds up, the depth of the stream is decreased and the temperature subsequently increases and both insect and fish life will no longer exist.

The cattle also trample the vegetation along the stream bank and without vegetation there would be no aquatic insects. The ecological balance is either upset or destroyed. Fencing the streams with fences like those on the Little Wood River would help keep the cattle away from the streams. Replant vegetation along the stream banks, and in time, the insects would return and the fish life would improve.

2

35

As I mentioned before, there has to be a balance struck so that all those who use the land and water can do so through thoughtful management of both. The Magic Valley Fly Fishers hope that this input is of some help to you in your attempt to address the many problems you face in this project. We would like to commend you on the remarkable job you have done in putting this draft together.

Very truly yours,

Dick Bonamarte

Dick Bonamarte
Conservation Chairman
Magic Valley Fly Fishers
Representing 90 members

cc: Jerry Conley, Dir. Idaho Fish & Game
Gary Will, Idaho Fish & Game
Rep. Noy Brackett
Sen. Laird Noh

36

Kimberly, Idaho 83341
March 24, 1982

Burley District Office
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sirs;

I would like to compliment the Burley Dietrict BLM for writing the best draft EIS of the onee I have etudied. Alternative A, the proposed action, ie e eeneible and practical plan that allows for reeource uee et a level which ehould enhance improvement of the forage production for livestock and browse for wildlife. I believe it ie aleo important to plan for improvemente like vegetation rehabilitation.

With the proposed range improvemante and eetablishment of grazing systems other than continuous use or seasonal uee, the forage available for livestock and wildlife will increase in those areas directly effected and indirectly effect the remainder of the range.

36.1 I euggest that actual uee recorde and e good utilization check are the best tools for stocking rate adjustmente. The "SVIM" procedurea are not accurate enough for decisions which jepordize a liveetock operator's stability.

36.2 I question the success of fencing riparian habitat. The fence may create more environmental disturbance than it prevente, and it ie sure to be e maintenance nightmare.

36.3 I euggest that the BLM involve the permittee extensively in the dicisions effecting his allotment because no one knows the range better and how the liveetock and wildlife will react to e change of management.

Sincerely,
Glenn E. Shewmaker

Response to Letter No. 36

36.1 The inventory procedure used was developed and tested by the SCS for use on rangelands. Actual use, utilization, and trend data will be used to evaluate adjustments in initial allocations. These studies are standard operating procedures and will be continued in the future and will ultimately determine the long-term stocking rates and management methods. Also see page 6 of the Draft EIS.

36.2 An Environmental Assessment (EA) will be prepared for each project included in the alternative selected for implementation. The purpose of the EA is to identify the need for the project, to assess the potential impacts that implementation of the project would have, and to determine the least environmentally damaging method of installation, project location, and so forth. In addition to the EA, all projects will be monitored to determine the success of the project in meeting the purposes identified and to insure that actual impacts are not greater than those projected in the EA.

36.3 Grazing permittees have been involved through the entire planning - EIS process. This involvement will continue through the decision and implementation process. The permittees have been and will continue to be involved with collection of resource study information in their assigned allotments. These permittees will be involved as cooperators in the development of management plans that involve their operations.

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March 24, 1982

Bureau of Land Management
Burley District Office
Route 3, Box 1
Burley, ID 83318

Attention: Scott Anderson
Magic Resource Area Manager

Dear Sir:

After looking over the Environmental Impact Statement Draft I feel the proposed action A or B would be the most beneficial to all concerned.

37.1 However in these proposals I do not see the need for additional fences, particularly the one mentioned for Fifth Fork; I cannot see the benefit of this proposed fence.

37.2 It seems that it would be quite difficult to ever set aside areas and mark them as special archeological sites when the history of this area very definitely shows that the Indians hunted and used the entire area in question.

Sincerely,

Shari Helman

Shari Helman
Rock Creek Resident

Response to Letter No. 37

37.1 A proposal to fence the Fifth Fork of Rock Creek was not included in the EIS under any of the five alternatives.

37.2 See Response 6.2.

March 22, 1982

38

Dear Mr. Anderson,

I wish to express my opinion concerning the environmental impact statement being prepared for the Twin Falls Planning Unit of Southcentral Idaho. I am a rancher especially interested in the area used by the Western Stockgrowers Association. I also have a sincere interest in the natural beauty of this country as well as a healthy wildlife population. I have lived here and worked in the BLM area concerned during much of the last 30 years.

Please consider my specific comments.

Generally I believe Alternative A would be quite good. However I think it would be very reasonable to increase the proposals for improvements which could allow greater increases in livestock grazing. Bitterbrush and some other desirable feed for deer and sage grouse could be seeded along with grasses, where this is a concern. A lot of sagebrush could be eliminated without serious harm to anyone.

I think it would be foolish to plan to increase the deer numbers very much. When conditions are poor we feed the

- 2 -

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cows for longer periods at home, but in a rough winter no one supplements the deer.

38.1 The areas designated as critical sage grouse area between Rock Creek and McMullen Creek are excessive. There are very few of these birds. A lot of sagebrush could be eliminated in patches and still allow ample feed ~~too~~ and nesting area for the grouse.

38.2 The proposed .85 mi. fence in 5th Fork of Rock Creek is un-called for and would only cause trouble. The riparian habitat is already excessively protected. Because of the rugged terrain deer and cattle would be trapped in dry draws and corners even if you allowed water gaps. In 5 years there would be nine messes everywhere and nothing good accomplished.

The livestock industry contributes much to Idaho's economy. We should be progressive. Significant increases in the livestock industry and sight increases in wildlife will significantly add to the healthy economy of the state.

Sincerely,
David W. Crockett

Response to Letter No. 38

3B.1 The area denoted as critical sage grouse range was identified through aerial surveys done in conjunction with the Idaho Department of Fish and Game. It has been determined that a high percentage of sage grouse nests are found within two miles of a strutting ground (Gill 1965, Gray 1967, Martin 1967, 1970). This critical area is known as a breeding complex.

If very few birds are present it is even more critical that their habitat not be eliminated through the removal of sagebrush. Enhancement measures need to be incorporated. For food, sage grouse are solely dependent upon sagebrush from October through April of each year. Sagebrush is also critical for winter nesting, brood rearing and escape cover. Open meadows and wet areas are critical for brood rearing and should be protected against any type of deterioration. Through proper planning in the layout and design of proposed treatment areas, sagebrush habitat can be enhanced for both wildlife and livestock.

References:

Gill, R. B. 196S. EFFECTS OF SAGEBRUSH CONTROL ON DISTRIBUTION ANO MOVEMENTS OF SAGE GROUSE. Colorado Game, Fish and Park Department. Game Research Report. Apirl. Part 3. W-37-R-17.

Gray, G. M. 1967. ECOLOGICAL STUOY OF SAGE GROUSE BROODS WITH REFERENCE TO NESTING, MOVEMENTS, FOOO HABITS ANO SAGEBRUSH STRIP-SPRAYING IN CLARK COUNTY, IOAHO. M. S. Thesis. University of Idaho. Moscow, Idaho.

Martin, N. 1967. EFFECTS OF SAGEBRUSH MANIPULATION ON SAGE GROUSE. Job Completion Report W-91-R-6 and W-91-R-7. Montana.

Martin, N. S. 1970. SAGEBRUSH CONTROL RELATEO TO HABITAT ANO SAGE GROUSE OCCURRENCE. Journal of Wildlife Management. 34(2): 313-320.

3B.2 See Response 37.1.

39

United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

I202-03(PNR-E)
OES-82/2

March 23, 19B2

Memorandum

To: Oistrict Manager, Bureau of Land Management, Burley, Idaho
Attention: Scott Anderson, Magic Resource Area Manager

From: Acting Associate Regional Oirector, External Services, Pacific Northwest Region

Subject: Twin Falls Livestock Grazing Environmental Impact Statement Oraft Addendum

We have reviewed the subject document and find no indication of adverse impacts upon recreational, historical or archeological resources.

Richard L Winters
Richard L. Winters

40

March 25, 1982

Nick James Cozakos, Dist, Mgr. or
Mike Haase, Team Leader
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Re: E.I.S.

To Whom it may concern:

The N Ranch of Kimberly and all those people involved therein prefer Plan A and B or any combination thereof. This being true for many and various reasons too numerous to mention unless specifically requested.

Yours very truly,

Wilmoth Kinsey
Wm. L. Kinsey and
Wilmoth Kinsey
Owner, Operator

41

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128 West 5th
Jerome Idaho 83338

Bus. Ph. 208-324-2411

3/25/82

Mr. Nick J. Cozakos
% BLM Office
Rt #3, Box #1
Burley, Idaho
83318

Dear Mr. Cozakos,

Being a lifetime native of Magic Valley, an avid sportsman and an aggressive businessman I have a deep interest in anything that may affect the lifestyle and economics of my chosen area. With reference to the various options proposed for range management in the South Hills of Magic Valley let me go on record as favoring Plan "A" with Plan "B" as the only other viable alternative.

My conception is that Plan "A" would maintain the range in a wild state for the deer and other wild life which are so very important to me while at the same time providing (through animal watering management) increased AMUs for cattlemen and, of course, the wildlife.

Plan "B" as I see it would basically maintain the status quo which has proven so successful over the past thirty to forty years. It is apparent to me that with the healthy deer herds and successful cattle operations in that area that the current range management technique has been basically correct.

As a sportsman I am very interested in good game management and maintainance of, or improvement of, game herds for sporting and esthetic purposes. I want my children, grandchildren and generations to come to be able to picnic in the South Hills and enjoy the flora and fauna indiginous to the area. At the same time I am businessman enough to know that controlled development to improve cattle operations to provide ranchers with the all american dream, the profit incentive, is important and the very backbone of our agriculture minded Magic Valley.

Let me restate that I support Plan "A" with Plan "B" as the only workable alternative.

Thank you for your consideration in this very important matter.

Sincerely,

J. Robin Kinsey Pharmacist Sportsman
J. Robin Kinsey R.Ph.

JRK/aw
cc Jerry Conolly IF&G, Bill Kinsey, Western Stockgrowers

42

3/24/82

Gentlemen:

I object to the proposed action in the Twin Falls EIS. The proposed action increases livestock grazing from existing levels. Increased grazing may degrade existing mule deer and upland game bird habitat and may further degrade riparian areas.

Cattle use of browse on critical deer winter range in fall is recognized as a problem (p. 75, EIS draft). However, the proposed cutoff date for cattle grazing of Sept. 30 will not alleviate the problem. I have observed substantial cattle use of browse in portions of southern Idaho in August and September. I recommend a July 31 cutoff for cattle grazing on mule deer winter range.

Proposed manipulations (range "improvements") would adversely affect 7% of the critical mule deer winter range and 25% of critical summer range (p. 78). Adverse habitat alteration of this much critical deer range should not be permitted. Range treatments prescribed for critical deer range should at least maintain, and hopefully improve the deer habitat. Eliminating brush and seeding perennial grasses and

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forbs on critical mule deer winter range will not enhance wildlife (especially mule deer) values. Mule deer are largely dependent on browse species on these winter ranges.

Range manipulations under the proposed action would adversely affect 13% of critical sage grouse nesting and brood rearing habitat (p. 82). The potential negative impact of this action on sagegrouse populations is great. The EIS should provide for more range manipulations that improve wildlife habitat rather than increase livestock forage at the expense of wildlife habitat.

As an individual concerned about the wildlife resource, I support the adoption of Alternative D (Reduced Livestock Use). It best suits the needs of wildlife in the EIS area.

Thank you for providing the opportunity to comment.

Sincerely,
Craig T. Krale
776 Meadows Dr.
Twin Falls, Idaho
83301

43

Route 2
Kimberly, Idaho

March 25, 1982

Nick J. Cozakos, Dist, Mngr. or
Mike Haase, Team Leader
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sir:

It is my observation that after reading the Environmental Impact Statement that Plan A or B far outweighs any of the other plans in desirability for this area south of Twin Falls.

I've observed many deer on private land in winter and summer. We believe that the range has been well managed for wildlife interests, ranchers' interests and the interests of the community. The E.I.S. as I read it more than takes care of the wildlife needs.

Sincerely yours,
D M Kinsey

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Route #2
Kimberly, Idaho 83341

March 25, 1982

Nick J. Cozakos, Dist. Mgr. or
Mike Haase, Team Leader
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sir;

I would like to lend my support to Plan A or B of the Environmental Impact Statement. My considered judgement that the E.I.S. under A or B takes the considered interests of all areas concerned as regards of the users of public range and I have been assured different wildlife concerns in this area are well provided for and well taken care of. I also realize the value of the multiple use concept and further believe that for the good of all concerned these will be the best plane.

Sincerely,
Berkie V. Brown

45

March 25, 1982
Twin Falls, Idaho

Nick James Cozakos, District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sir:

The Magic Valley Cattlemens Association would like to go on record not in support of any one single alternative, but as an organization to show support of this land for continued livestock grazing in cooperation with wildlife and recreation use.

We believe the livestock people are the ultimate environmentalists as we wish to preserve our lands for future generations, at the same time deriving a living as well as pleasure from this land.

We are opposed to the attitude of Idaho Fish and Game. We feel they have taken information out of context from this draft and have provided area sportsmen information that is detrimental to the economy of this area.

Norman Schnitker
Norman Schnitker
President
Magic Valley Cattlemens Association

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March 25, 1982
Filer, Idaho

Burley District Office
Bureau of Land Management
Attention: Scott Anderson, Magic Resource Area Manager
Route 3, Box 1
Burley, Idaho 83318

Dear Sir:

Concerning the Twin Falls Livestock Grazing Environmental Impact Statement Draft.

I wish to show my support of Alternative "A" as long as it is considered a draft to be used as a guideline to determine future policy for the use of Bureau administered land.

I would recommend this as a plan that can be amended to suit all users of this land with consideration to changes that could become necessary as time requires.

Sincerely,

Tom Sharp
Tom Sharp
Permitee

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March 25, 1982

Mr. Nick James Cozakos, Dist. Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Mr. Cozakos,

I would like to make some comments concerning the Draft of the Twin Falls Grazing Environmental Impact Statement.

My name is Dan Shumaker. I reside at Kimberly, Idaho where I have lived most of my 32 years. I am an avid outdoor sportsman. I do not lease any public land in the state of Idaho.

The BLM and its lessees have a terrific investment in seedings, fences, pipelines, water tanks, cattle guards and other improvements in the Twin Falls Planning Unit. Reduction or elimination of maintenance on existing land treatments would be a waste.

The trend of seedings would decline if livestock are reduced or removed and seeding maintenance is eliminated. Conversely, trend would improve with increased livestock use and implementation of improved grazing systems and proposed land treatments. Also, better livestock distribution due to improvements proposed in the Increased Livestock Use alternative would help change the trend to upward on all areas.

Under the Reduced Grazing and No Livestock Grazing Alternatives, seedings and native grassy areas would eventually be overtaken by reinvading sagebrush. As this progresses, production of usable forage would decline. However, production would be increased with the Increased Livestock Use alternative and its initiation of grazing systems on 113,948 acres presently subjected to repeated seasonal grazing. As a result of grazing management, cover would improve under the Increased Livestock Use alternative.

I have serious doubts regarding IDFG's projected big game populations and future big game AUM's. I doubt this degree of increase is warranted. The IDFG has mismanaged the big game and upland game to its present sorry state and I doubt they do any better in the future. This saddens me because of the fact that a very large deer herd once flourished in southern Twin Falls County. Cattle, deer, and antelope coexist beautifully in the area

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and potential for an increased big game population and increased livestock use is there. Heavy livestock use in the early summer can increase vigor and production of browse species that are important and necessary (according to IDFG) as winter forage for mule deer. Cattle knock the bitterbrush down to where mule deer can reach the edible parts. Under Reduced Livestock and No Livestock Grazing alternatives critical mule deer wintering areas would deteriorate.

On page 77 of the draft in the discussion of the impacts of the Increased Livestock Use alternative it states, "An unknown number of deer could die during periods of high snowfall because of a lack of adequate forage." This statement would apply to to all five alternatives.

The stocking rate of livestock would have very little, if any, impact on upland game habitat and populations. Anyone who has traversed the southern part of Twin Falls County could testify to the vast area available for cohabitation of livestock and wildlife. There is habitat available

(3)

for many times the present population of upland game. The area in question has a history of being a haven for sage grouse and I would look forward to the day when it can be again. This increase would be possible along with increased livestock use.

On page 84 of the draft is stated under the Existing Use, Reduced Livestock Use, and No Livestock Grazing alternatives that sage grouse nesting and brood-rearing areas would deteriorate. Therefore increased livestock grazing would prove beneficial for sage grouse populations. The intensive range management and grazing systems in the proposal to increase grazing would benefit all.

I hate to hear talk of fencing off streams or digging potholes. By fencing a stream all you do is concentrate use on that section of the stream that is not fenced. Almost all animals concentrate around the source of water. It is in the natural scheme of things. In my estimation, potholes are detrimental to the ecosystem around and including a meadow. Worse than that, they are eyesores. There exists enough habitat naturally to provide for aquatic wildlife.

(4)

Our public lands produce a valuable renewable resource – forage that can be converted to red meat. Increasing demands for this food will be seen in the future. We must begin now to manage our public lands for the greatest possible production of forage. Future generations may well depend to a great extent on our foresight – or lack of it.

I favor the Increased Livestock Use alternative for all of these reasons and more. I believe we should manage this valuable resource to its full potential. Anything less would be waste.

Thank you for allowing me to comment.

Dan H. Shewmaker

DAN H. SHEWMAKER
RT 2
KIMBERLY, IDAHO 83341

(5)

48

Nick Cookas
Bureau of Land Management
Route #3 Box 1
Burley, Idaho 83318

Dear Sirs:

I am writing to state my position on the "Twin Falls Livestock Grazing Impact Statement".

I am very much in favor of alternative A, I feel this plan does justice to all of the people who uses the public land as well as increasing the economical value of the land to the people of Twin Falls County.

After the public hearing up Twin Falls on February 25th I had a chance to talk to men →

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several of the sportsmen who testified at the hearing. I asked them the reasons they felt the way they did. Many of them told me they were called to testify and was given a sheet of paper to read. I found out that the paper was made up by the Idaho Fish and Game Department. Many of the sportsmen did not understand the proposed plan (Alternative A)

I feel a state agency such as the Fish & Game has no right to operate in this manner. They work for the taxpayers of Idaho which are also the ranchers who use this land as well as the sportsmen.

Therefore I feel much of the testimony given that night should not be given full consideration.

I feel another public meeting would be in order for the B.L.M. to explain the plans as well as how the plans would be carried out. Many of the people does not understand how the B.L.M. does their improvements such as spraying, seeding, burning etc.

Sincerely Your
Norman Schnitker
L & M Land & Cattle
Route 2
Twin Falls, Idaho 83301

49

IDAHO DEPARTMENT OF FISH AND GAME
600 South Walnut • Box 25
Boise • Idaho • 83707

March 26, 1982

Mr. Nick Cozakos, District Manager
U.S. Bureau of Land Management
Route 3, Box 1
Burley, ID 83318

Dear Mr. Cozakos:

We have reviewed the "Twin Falls Grazing Draft Environmental Impact Statement" and offer the following comments on the five alternatives presented in the document.

A. Chapter 2, Alternatives including the Proposed Action, Pages 3-33.

1. Alternative A. Proposed Action (Preferred Alternative, pages 3-19.

a. Even though the proposed action allocates sufficient forage to satisfy the needs of big game populations projected by the Department through 1990, we find it lacking for the following reasons:

49.1 (1) The overall objective of Alternative A is inadequate. As stated on page 5, paragraph 2, lines 1-4, "The overall objective of the proposed action is to prevent deterioration of soil, vegetation, and related resources by allocating forage among competing uses, while maintaining or enhancing the social and economic status quo." The overall objective should be to "improve" soil, vegetation, riparian and range conditions, not simply maintain existing conditions.

(2) Forage allocations to livestock would increase from 54,472 AUM's (past six year average licensed use) to 71,210 AUM's, an increase of 31%. This is a 57% increase above actual authorized use (preference). This level of grazing would adversely impact important mule deer and upland game habitat and most riparian
49.2 areas would show no improvement. The increase in numbers of livestock on these ranges will create wildlife displacement which was not adequately addressed.

• EQUAL OPPORTUNITY EMPLOYER •

Mr. Nick Cozakos
March 26, 1982
Page 2

(3) Range treatment projects totalling 13,544 acres and seeding maintenance projects totalling 32,954 acres would seriously impact important mule deer and sage grouse habitat. On important mule deer and sage grouse ranges, we recommend no treatment unless it improves the habitat for these two species.

(4) The amount of monies that will be spent on developments, treatments, etc., for livestock amounts to 5.4 times greater than the amount to be spent on wildlife. Wildlife developments (Table 2-6, page 13) are insufficient because too few acres would be improved specifically for wildlife species. Many allotments could be improved significantly for wildlife, especially mule deer and upland game, through well planned and executed projects which could include controlled burning, chaining and interseeding of forbs and
49.3 legumes. Range treatments included in the proposed action are designed primarily to increase forage for livestock and anticipated benefits for game species are used to help justify the treatments. In many instances these treatments would be more detrimental than beneficial to the animals involved.

(5) Under new rules and regulations recently adopted by the BLM, permittees will be required to assume responsibilities for range improvement developments and maintenance. New water developments along with existing structures will attract a variety of wildlife
49.4 species. If these water sources are shut off when livestock are removed from pastures during the summer months, severe impacts will occur. Provision should be made to continue water supplies through the month of September.

(6) Continued early spring, fall and winter livestock grazing on at least three key allotments (Western Stockgrowers, Point Ranch, Loat Creek-U2) important to wintering mule deer would result in (a) continued mule deer/livestock competition for both forage and space, (b) unnecessary mule deer stress and potential reduced productivity, and (c) little or no improvement in range conditions. We would recommend livestock grazing on important mule deer winter ranges in these allotments not begin until May 1 and terminate no later than August 31.

49

B. Chapter 3, Affected Environment, Pages 35-51.

1. Wildlife, pages 42-44.

Descriptions of existing wildlife populations and distributions seem adequate.

49.6 2. Aquatic Wildlife, page 44.

The last sentence in paragraph 2 referring to the four streams with the best game fish populations (Fifth Fork Rock Creek, McMullen Creek, Salmon Falls Creek, Shoshone Creek) reads, "The trout fishery is maintained via a stocking program by the Idaho Department of Fish and Game." This is not technically correct. No trout are stocked in either McMullen Creek or the Fifth Fork of Rock Creek and both of these streams have good self-sustaining wild trout populations. Limited supplemental plants of catchable rainbow are made in sections of Shoshone Creek and Salmon Falls Creek, but each of these streams has a good population of wild trout. Brown trout fry have been stocked in Salmon Falls Creek in past years and portions of the stream between the Nevada state line and the reservoir backwaters have good natural reproduction of brown trout. Shoshone Creek currently receives annual stockings of brown trout but natural reproduction of browns is occurring on portions of the stream.

C. Chapter 4, Environmental Consequences, pages 53-102.

1. Wildlife, Big Game, pages 74-80.

a. Under "Grazing Systems," pages 75-76, BLM states livestock should not be allowed to graze critical mule deer winter range after September 30. We recommend no livestock grazing be permitted before May 1 or after August 31.

b. Under "Range Improvements," page 78, it should be pointed out that any brush removal (i.e. sagebrush, serviceberry, bitterbrush, etc.) on critical mule deer winter range would be extremely detrimental to wintering deer because of loss of forage and/or thermal and hiding cover. "Critical" mule deer winter range should be managed primarily for mule deer and range treatments should be authorized only if they "improve" conditions for wintering deer.

c. Page 78, paragraph 4, sentence 2 states, "The two percent of critical mule deer winter range scheduled to be burned and drill-seeded to perennial grasses and forbs would
49.7 enhance wildlife habitat values." The statement is not correct. Burning critical mule deer winter ranges and seeding them to perennial grasses and forbs will eliminate important browse species needed for winter forage and cannot be justified.

49.8 2. Wildlife, Upland Game, pages 80-84.

a. Under "Range Improvements," page 82, paragraph 6 states, "Burning can create a diversity of usable sage grouse habitat. The edge effect would be enhanced. Sage grouse habitat burned in small patches (Klebenow and Beall, 1977) and on a rotational basis would be most beneficial to sage grouse." It should be pointed out such burning enhances sage grouse brood-rearing habitat but may be detrimental to wintering and nesting birds which depend heavily on dense sagebrush.

49.9 b. Under Range Improvements," page 84, paragraph 3 states, "No range improvements are scheduled under the Reduced Livestock Use Alternative. The wildlife projects to be developed would enhance the sage grouse habitat. The lack of new land treatments or maintenance of existing treatments would result in sage grouse nesting and brood-rearing habitat becoming 'choked' with dense vegetation and thus being less productive. Sage grouse productivity would decline if natural factors did not open up these critical habitat areas." Maintenance of existing treatments would be beneficial to sage grouse only on brood-rearing areas where sagebrush is not critical and 10-15 percent canopy coverage is adequate for thermal and hiding cover. Maintenance of existing treatments within nesting and wintering areas would be detrimental since sage grouse require dense sagebrush in these areas. It is doubtful that, under the Reduced Livestock Alternative, brood-rearing habitat would become "choked" with dense vegetation and become less productive.

3. Wildlife, Threatened, Endangered, Sensitive, High Interest, Nongame Wildlife, pages 87-90.

49.10 a. Page 87, paragraph 10, lines 1-3, implies mountain quail, river otter and beaver are nongame species. The Department has classified the river otter and beaver as furbearers and the mountain quail as a game bird.

4. Other environmental consequences pertaining to big game, upland game, threatened, endangered, sensitive, high interest and nongame wildlife appear to be adequately addressed.

Overall, we are concerned that, if the Record of Decision encompasses the Preferred Alternative (A) without modification, impacts will occur to fish and wildlife resources that would be in conflict with the multiple use sustained yield concept. We therefore request that consideration for the concerns we have expressed in our comments be evaluated in making the final decision.

Sincerely,

for Robert L. Salter
Jerry M. Conley
Director

cc: Region 4
Clearinghouse
Wildlife Management Institute
Bur. Fisheries
Bur. Wildlife

Response to Letter No. 49

49.1 See Response 34.2.

49.2 Forage allocations were made first to meet big game needs, then to meet livestock needs. Through 1990 no adverse impact would occur to big game.

It is true that an increase in numbers of livestock on these ranges could create wildlife displacement. As livestock numbers on the range increase, wildlife populations will be closely monitored to determine the effects of increased livestock use upon wildlife populations.

49.3 See page 17 in the EIS and the response to letter 21.2.

49.4 Water would be provided for wildlife use during the period from April through October on all proposed pipelines. In addition, bird watering guzzlers would be placed along new pipelines. See page 16, paragraph 4.

49.5 Pages 84-87 in the EIS state some forms of habitat improvement. These improvements, though not optimum, are mentioned under the Proposed Action. Several items are as follows:

- 17 miles of riparian habitat would slightly improve as a result of proposed changes in grazing systems on two allotments.
- 10.4 miles of fence would protect 35.5 acres of riparian habitat.

49.6 Bob Bell, Region IV Fishery Biologist, IDFG, indicates that McMullen Creek and the Fifth Fork of Rock Creek have excellent wild trout populations. No stocking program has taken place in the past 20 years. He mentioned that 40-50 years ago these streams were probably stocked with rainbow trout as trout were then widely stocked throughout the state.

49.7 The fact that some adverse impacts would result from burning of critical mule deer winter range (as well as beneficial impacts) is recognized on page 78, paragraph 4. "One negative aspect of burning would be that bitterbrush will not resprout if the soil is not wet or it does not rain shortly after the fire (Wrigth 1972). The loss of bitterbrush on critical mule deer winter range would be detrimental to the population, especially during a severe winter."

49.8 Before any land treatment, such as burning, occurs in critical sage grouse range, wintering ad nesting areas will be identified and areas will receive protection from the proposed treatment. Special criteria for the various sage grouse use areas have been identified in the BLM planning process.

49.9 Research indicates sage grouse often nest close to or under sagebrush in the 7-20 inch height class in areas where vegetation covers about 50 percent of the ground surface. High nesting success also has been noted in small draws where low-growing vegetation is dominant. Livestock reduction may result in existing nesting sites (of the type mention above) and brood-rearing areas becoming overgrown and thus less productive. No mention was made of wintering areas because more densely vegetated sites would be beneficial. No maintenance is proposed under Alternative D.

49.10 In this paragraph, the mentioned species were not to be considered as non-game. The river otter and mountain quail are sensitive species and the beaver is a high interest species.

(7) It will be difficult for the Department to meet its long-term upland game management objectives with a 31% increase in actual livestock use and 46,498 acres of range treatments and maintenance.

b. There are several major negative fishery aspects of the proposed action, including:

(1) No significant improvement in fisheries habitat, if any, would occur in specific areas as only seven percent of riparian habitat would be fenced (as opposed to 43% in Alternative D). An overall decline in aquatic habitat would occur.

(2) A significant increase in grazing would occur under this alternative; 57% above preference and 31% above average use.

(3) The sharp increase in grazing could offset any small advantage offered by the fencing and could actually result in lower water quality and poorer riparian habitat on some of the streams.

(4) The proposed treatment of 13,544 acres of sagebrush can result in increased stream sedimentation in certain areas and compound the water quality problem.

(5) An increase in stream water temperatures--already critical in some areas--would occur from loss of riparian habitat.

49.5 Under the Aquatic Wildlife section on page 30 of Table 2-14, it states, "Fisheries and furbearer habitat to improve slightly. Seven percent of riparian habitat would be fenced improving food and cover supply in these areas." This is in direct conflict with the statement on paragraph 1 under VEGETATIVE ALLOCATION, page 84 which reads, "In both the short and long term, aquatic wildlife habitat would continue to be adversely affected because, under the Proposed Action, livestock would still tend to heavily utilize riparian areas. The quality and quantity of waterfowl nesting cover would continue below optimum. New riparian growth would be inhibited and streambank erosion would continue."

2. Alternative B, Increased Livestock Use, Pages 19-21.

a. This alternative is unacceptable because it does not provide for the needs of big game populations projected by the Department through 1990. The total allocation to big game would be 3,294 AUM's, a shortage of 1,111 AUM's. In addition, a 68% increase (above the six-year average licensed use) in livestock grazing in conjunction with 84,280 acres of range treatments and maintenance would make it impossible for the Department to reach its long-term management objectives for important wildlife species.

b. The following negative effects on the aquatic habitat would occur under this alternative: (1) higher livestock numbers would adversely affect riparian vegetation; (2) the proposed 23% increase in grazing would adversely affect fisheries habitat and the fisheries resource; (3) water quality would suffer from the increased grazing and proposed land treatments; and (4) stream bank erosion would accelerate and an increase in stream water temperatures would likely occur due to loss of riparian habitat.

3. Alternative C, Existing Stocking Level ("No Action" Alternative), Pages 21-24.

a. The "No Action" alternative will provide for the needs of big game populations projected by the Department through 1990, but in our opinion is otherwise unacceptable for the following reasons:

(1) Soil, vegetation, riparian and range conditions would not improve.

(2) Early spring, late fall and winter livestock grazing on important mule deer winter ranges would continue.

(3) Existing land treatments (seedings) would be maintained and not improved for wildlife.

(4) The Department could not meet its long-term management objectives for small and nongame species.

b. This alternative is undesirable to the aquatic resource for the following reasons:

(1) No improvement in aquatic habitat would occur.

(2) Riparian areas-already poor in many areas--would continue to be heavily grazed.

(3) Streambank erosion would continue at relatively high rates.

(4) Water quality would not improve.

(5) Water temperatures would increase, adversely affecting fisheries.

4. Alternative E, No Livestock Grazing, Pages 27-28.

a. We feel this alternative is socially and politically unacceptable and is not a viable alternative.

5. Alternative D, Reduced Livestock Use, Pages 24-27.

a. This is the alternative that provides the most benefits for fish and wildlife and we support it for the following reasons:

(1) The overall objective is to maximize nonlivestock uses and values, particularly wildlife and specific fisheries, recreation, watershed and aesthetics, without complete disruption of the social and economic conditions associated with livestock husbandry on public lands within the EIS area (page 24, paragraph 4, lines 1-5).

(2) Forage would be provided to meet the Department's 1990 big game population projections.

(3) Increased habitat diversity would be provided for game and nongame species.

(4) Water quality and riparian areas would improve significantly.

(5) Soil erosion would be reduced.

(6) Hunting opportunity would increase allowing the Department to meet long-term management objectives.

(7) No new land treatments would be authorized and existing treatments would revert to native range. Both, for the most part, would benefit wildlife populations.

Continued early spring, fall and winter livestock grazing on at least three allotments (Western Stockgrowers, Point Ranch, Lost Creek-U2) important to wintering mule deer would result in impacts identified in item 1,a(6). We recommend livestock grazing on important mule deer winter ranges in these allotments not begin until May 1, and terminate no later than August 31.

Continued early livestock grazing on important sage grouse nesting areas would result in considerable nest destruction and desertion. To minimize these impacts, it is recommended key nesting areas not be grazed until after June 1.

Fencing (24.45 miles) would protect 207 acres of riparian vegetation from livestock. The remaining 274 acres of riparian vegetation would still receive moderate to heavy livestock use and wildlife species would continue to be severely impacted. We recommend a more concerted effort be made to protect riparian areas from heavy livestock grazing.

b. This is the best alternative from a fisheries standpoint. Some positive fisheries points are:

(1) One objective is to maximize fishery habitat and improve riparian condition on all streams.

(2) 43% of the riparian vegetation would be fenced, thus improving aquatic wildlife habitat.

(3) A significant decrease in the erosion rate would occur.

(4) Water quality in general would improve.

(5) An increase in angler opportunity would occur.

50

Craig R. Blewitt
205 N. Busey St. #2
Urbana, IL 61801

March 22, 1982

Nick James Cozakos, District Manager
Bureau of Land Management
Route 3, Box 1
Burley, Idaho 83318

Dear Sir:

I am concerned about the environmental consequences of the Twin Falls Livestock Grazing Program. After carefully studying the Draft EIS for the Program, I have devised some comments which I hope will be useful to you in improving the current assessment of environmental impacts of the five alternatives.

PURPOSE AND NEED

50.1 An expansive discussion of the purpose and need of the project would have been very valuable. However, the only clue to the reason for the project from the Draft EIS is that "some specific resource problems related to livestock grazing have been identified." This vagueness of purpose hinders the analysis of the proposed action and the four alternatives, as well as the EIS in general.

ENVIRONMENTAL CONSEQUENCES

The environmental impacts caused by livestock grazing for which I have the most concern are the effects on wildlife and vegetation, especially the effects on sensitive species and species associated with riparian and wetland areas.

Impact Assessment

The Draft EIS very adequately identifies the vegetation and wildlife species which will be affected by the various alternatives, and also properly determines whether they will be beneficially or adversely affected. However, it is very difficult to compare the environmental consequences of the five alternatives without more specific information on how the species will be
50.2 affected beyond the determination of adverse or beneficial impact. Such comparison would be made much easier if the EIS included projections of species population changes which would occur as the result of the alternatives as well as more extensive data on the impact on wetland and riparian areas. This type of information would make the degree of impact on wildlife and vegetation more clear and thus would greatly aid in assessing the merits and shortcomings of each of the alternatives.

Fencing of Riparian Areas

Since riparian areas tend to be heavily used by both livestock and wildlife -- including several sensitive species, it follows that the protection of these areas is the key to protecting wildlife. Although this relationship has been implied in the EIS, more discussion is warranted, especially in terms of a more thorough comparison of the benefits provided wildlife by Alternatives A

50

50.3 and D considering the vast difference in riparian area protected (7% in Alternative A versus 43% in Alternative D). In particular, more attention needs to be given to the benefits afforded sensitive species due to fencing. Such protection would without doubt beneficially affect both the mountain quail and river otter, yet mention of benefits to sensitive species was totally omitted in the section on sensitive and endangered species in Chapter 4 (pp. 87-90).

Sensitive Species

In general, the Draft EIS does not give adequate attention to analyzing the impacts on sensitive species. The lack of projected population levels of sensitive species for each of the alternatives and the neglect to consider the benefits of fencing to these species has led to a great deal of uncertainty as to their future well-being.

In the face of this uncertainty, I suggest that the following mitigating measures be taken to protect and provide for the needs of sensitive species:

1. Identify the specific spring breeding areas of all sensitive species.

2. Rest these identified areas during early spring grazing periods when employing the deferred-rotation grazing system.

3. Refrain from concentrating livestock-use in these areas during the early spring as part of the rest-rotation or deferred-rotation systems.

I hope that you will seriously consider my comments and mitigating measures and that they will be useful in preparing the Final EIS of the Twin Falls Livestock Grazing Program.

Sincerely,

Craig R. Blewitt

Craig R. Blewitt

Response to Letter No. 50

50.1 See Response 34.1.

Council on Environmental Quality guidelines (40 CFR 1500) do not indicate that "an expansive discussion of the purpose and need" is required.

50.2 Population projections for mule deer are as follows:

	Spring-Early Summer (4/15-6/30)	Summer-Early Fall (7/1-10/31)	Late Fall-Winter (11/1-4/15)
1980	595	420	1,830
1990	653	508	3,297

Current species populations for other wildlife species found in the EIS area are not known with any degree of certainty and therefore population projections are not possible.

A discussion of the impacts on wetland/riparian areas may be found in the EIS as follows:

Section	Pages
Soils and Watershed	54-60
Vegetation-Riparian Areas	60-61
Wildlife-Aquatic Wildlife Habitat	84-87

50.3 Alternative D on page 90 in the EIS clearly states that wildlife projects would benefit threatened, endangered, sensitive, high interest, and non-game wildlife species.

Under Alternative D, 25.05 miles of fence would protect 207 acres of riparian habitat. This fencing would be a benefit to sensitive species as well as aquatic and other wildlife species. And though the fencing is not specifically identified on page 90, its benefits are recognized in the analysis presented.

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IDAHO CATTLEMEN'S ASSOCIATION

MIKE MOGENSEN, Executive Vice President

OFFICERS
PRESIDENT
David Bivens — Payette
VICE PRESIDENTS
Tom Prescott — Jerome
Blair Fisher — Rexburg

March 29, 1982

Mr. Nick Cozaks
District Manager Bureau of Land Management
Route 3, Box 1
Burley, ID 83318

Dear Nick:

On behalf of the Idaho Cattlemen's Association and its members in the Twin Falls area we submit the following comments relative to the draft Twin Falls Grazing Environmental Impact Statement.

Alternative A, the proposed action allowing for gradual increases in livestock and big game AUMs is generally acceptable where it provides for gradual increases of AUMs for both livestock and wildlife. Establishment of grazing management systems under the proposed action is also a positive note. However, according to our members in that area there is tremendous potential for increased range development and AUMs to make Alternative B even more acceptable. As you know this area is excellent rangeland for both livestock and wildlife, and if managed properly could produce large quantities of high quality forage.

Portions of this area burned approximately 15 years ago resulting in increased forage quantity. These areas are now in need of further range improvements through burning or sagebrush control to maintain and increase productivity. The 231,298 acre area provides adequate acreage and potential for increasing both uses. One of the limiting factors appears to be lack of water developments for livestock and wildlife. Alternatives A and B would help meet the goals of increasing water supplies along with burning and seeding additional acreage. Alternative B would allow approximately four times as much range improvement through brush control and seeding as compared to Alternative A. It appears the range improvement program outlines in Alternative B could result in greater benefit for livestock and wildlife and the economy. The increase in wildife AUMs seems acceptable to our members who enjoy hunting and ifhsing in their area as does the general public.

On page 10 table 2-4 referring to season of use, we stress the importance of maintaining the current turnout dates and periods of use under the various allotments. Any changes in these dates could seriously affect use patterns of the permittees between BLM and forest service permits.

We would also discourage construction of "pot holes" for wildife in existing meadows. Alternative means of developing

2120 AIRPORT WAY • BOISE, IDAHO 83705 • PHONE (208) 344-9482

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Twin Falls EIS
March 29, 1982
Page 2

water for wildlife would lessen the impact on these meadow areas while at the same time provide adequate water supply for these animals.

In summary, the proposed action would benefit the economy while providing multiple use for natural resources in this area for livestock production, recreation, hunting and fishing and related uses. We encourage your staff to choose either Alternative A or B as the plan of action. We appreciate the opportunity to comment on this EIS, and would like you to keep us informed on further actions relative to this resource area.

Respectfully Submitted,

Mike Mogensen

Mike Mogensen
Executive Vice President

MM/lkc
cc: State Director Clair Whitlock

52

United States Department of the Interior
BUREAU OF RECLAMATION
~~WATER AND POWER RESOURCES SERVICE~~
MINIDOKA PROJECT OFFICE
1559 HANSEN AVENUE
BURLEY, IDAHO 83318

IN REPLY REFER TO: 400
120.1

March 29, 1982

Memorandum

To: District Manager, Bureau of Land Management
Burley, Idaho

From: ACTING Project Superintendent, Burley, Idaho

Subject: BLM Twin Falls Livestock Grazing Environmental Impact Statement, Idaho (DES 82-3) (Your Memorandum February 12, 1982)

We have no comments on the subject Environmental Impact Statement.

Robert R. Pittard

53

March 25, 1982

Mr. Nick Cozakas,

I think there should be more stream protection in the wild life areas.

The pasture rotation for the mule deer areas should be intensified.

I would like to see less spraying and more railing.

Thankyou,

Mike Crown

Mike Crown
Route 4 Box 134
Buhl, Idaho 83316

54

March 25, 1982

Mr. Nick Cozakas,

I do not think alternative A does enough for wild life. I think there should be less spraying on the wildlife forage.

I would like to see more rotation of deer winter range.

I would like to see more pot holes, resevoures, and pipelines. More water development is needed. It would benefit both grazing and wild life.

Thankyou,

Delean Crown

Delean Crown
Route 4 Box 134
Buhl, Idaho 83316

55

March 25, 1982

Mr. Nick Cozakos,

I would like to retract my statement that I made at the public hearing. I do not support alternative B, as I stated.

As far as I'm concerned I do not support any of the alternatives as written.

Alternative A may be accepted with some amendments, such as--

less spraying,

more stream protection,

more pasture rotation on initial mule deer winter range,

and some grouse nesting areas.

I would recommend groundwater development to ease the cattle concentration on the stream areas.

I would like to see more railing instead of so much burning and spraying.

Thank you Elwyne L Crown

Elwyne Crown

Route 4 Box 134

Twin, Idaho

83316

56

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

In the Matter of:

Public Hearing
Twin Falls Grazing
Environmental Impact Statement
for the Burley District

BEFORE

Guy Baier
Chief, Division of Resources
Idaho State Office
Bureau of Land Management

DATE: February 25, 1982

PLACE: Twin Falls, Idaho

Thursday, February 25, 1982, 7:00 p.m.
In Twin Falls City Hall

Twin Falls Livestock Grazing EIS Hearing

MR. BAIER: This is the appointed place to conduct the public hearing on the Livestock Environmental Impact Statement Draft for Twin Falls and to receive testimony on the document this evening. If you care to register, we will be receiving testimony this evening on the subject of this particular document.

My name is Guy Baier. I am the Chief, Division of Resources in the Idaho State Office of the Bureau of Land Management. I have been designated by the State Director to chair this hearing this evening. The members of the panel up here that you see with me this evening are Nick Cozakos, who is the District Manager for the Burley District, Scott Anderson on my left, who is the Magic Resource Area Manager and Mike Haase, who is the team leader who prepared the Environmental Impact Statement you have before you. If there are any of you who would like copies of the document, there are extra outside that are available for you if you need a copy.

The purpose of the hearing this evening is to obtain public comments and your suggestions concerning this particular draft Environmental Impact Statement. Panel members are particularly interested in your comments on Chapter 2 on the alternatives, including the proposed action and the impact analysis and Chapter 4 of the Environmental Consequences of the proposed actions.

We will be using a tape recorder this evening. We will not have a court transcriber but everything that is said will be noted and it will be taken for use in the record. It will be helpful if you have any written comments. You can give them to us or we can file them and we will make them part of the record. Comments received tonight plus any written comments that are received prior to close of business March 26 will be considered in developing the final EIS. All of your written comments need to be addressed to the District Manager, Burley District Office, BLM.

The witnesses this evening to testify will be called in the order of the list that was prepared based upon early filings up to today, and as you register this evening. Before we finish this evening, anyone else who did not register, who wishes to testify, will have the opportunity to do so. We do have a lot of people who want to present information to us, so I will be placing a time limit upon oral

presentation. I will provide the opportunity for each person to provide testimony for ten minutes. I will notify you when you have reached a nine minute mark and give you the opportunity to summarize and finish within ten minutes. At the end of the evening, after everyone has had the opportunity to present their testimony, if anyone who has previously testified wishes to add to that, I will provide them with that opportunity.

If you have written testimony you want to present for the record, you do not have to present orally, you can leave it with us and it will be entered into the record. You may testify orally if you so desire. When you come to the lectern to present your testimony for the record on the tape recorder, would you please state your name and who you represent.

The first witness we have this evening is Mr. Elmer Parrott.

MR. PARROTT: I am Elmer Parrott, a user in the Magic Resource Area. I have a definite preference for the implementation of alternate Plan A. This area has the potential for increased development to the benefit of all, with little degradation occurring.

The grazing increase in Plan B would be only minimal above the development in Plan A.

Plans C, D, and E would each go farther in the locking up of a viable renewable resource of considerable economic value, with little enhancement of other uses of the area.

Alternative A stands out far above other alternatives in increased values and returns for all involved.

Thank you.

MR. BAIER: Thank you. I see one item I did not mention. We have some panel members here. Their sole purpose is to clarify any comments that a witness presents that they do not understand. The purpose of the hearing is to receive information from you, it is not a cross-examination type situation. Be very casual about the operation, but the only questions that we can entertain would be questions which clarify testimony you present.

The next witness is Mr. Bill Brockman.

MR. CROCKETT: Bill Brockman is in the hospital, so I am reading this for him.

I am David Crockett. I would like to offer testimony on behalf of the Western Stockgrower's Association of Hansen, Idaho.

The Western Stockgrower's Association is comprised of nine members and their families who graze a combined total of 3,000 head of cattle on BLM administered land south of Kimberly, Idaho.

We would like to commend the BLM, the members of the EIS Fact-Finding team and Area Manager Scott Anderson for the time and effort they have put into the Twin Falls EIS draft. We believe they have combined watershed, recreation, wildlife, and livestock grazing concerns into a workable management plan for the Federal Range in our area.

The members of our Association do, however, have two areas of
56.1 concern. Number one is the proposed fencing of .85 hundredths of a mile along the Fifth Fork of Rock Creek. We feel this proposed fence is not in the best interest of recreation, fishing or scenic beauty. It will be a threat to deer wintering in the area, and will tend to bunch cattle going to water and cause serious watershed problems.

56.2 Concern number two pertains to Table 3-5 page 43. We are willing to accept aerial winter counts and the Idaho Department of Fish and Game's population estimates for mule deer numbers on the Western Stockgrower's Association allotment. However, by computing the numbers supplied in Table 3-5, we arrive at a figure of 7,185 deer count over a twelve month period. Since it takes five deer to equal one AUM, we believe the figure under the column heading "Proposed Wildlife Initial and Long Term" should read 1,437 AUM's instead of 2,977 AUM's as printed.

MR. BAIER: Thank you very much.

Mr. Arthur Kaster. Mr. Arthur Kaster. Mr. Mike Werner.

MR. WERNER: I am Mike Werner from Kimberly, Idaho. I represent myself and especially as a sportsman.

We feel that we are against your proposed A. It doesn't allow the allotments for the deer that could be and hopefully will increase up there. Therefore, we are in favor of proposed D. I have talked to several people and many of them feel this way.

Thank you.

MR. BAIER: Thank you Mr. Werner. Jim Daniels.

MR. DANIELS: I am Jim Daniels and I support the Sportsmen Club.

I would like to support Alternative D except for a few things in there, which seems to have a little bit too much spraying in some areas. I believe we should cut back the best we can on overgrazing in winter areas. For one thing, of destroying the shelter and also latter on we won't have much browse for the animals. I disapprove of total sagebrush removal in some areas or by spraying or burn, because in some areas if you get total winter wheat you just have nothing out there but either cattle or seems like ground squirrels. I believe it should be sparse sagebrush removal in some areas leaving some cover of vegetation in some sections rather than just total removal.

That is all I have to say.

MR. BAIER: Mr. Lyle Deitrick.

MR. DEITRICK: Lyle Deitrick, Sportsmen Club. I go along with Jim Daniels on his view of the situation.

MR. COZAKOS: Where are you from?

MR. DEITRICK: Filer, Idaho.

MR. BAIER: Jack Wendling.

MR. WENDLING: I'm Jack Wendling from Filer. I am representing myself. Not having had an opportunity to go through the addendums to the basic document, but only referencing the basic document, I favor Alternative D as the only one benefiting the greatest number of people at the least cost.

Thank you.

MR. BAIER: Thank you. Jerry Montgomery.

MR. MONTGOMERY: My name is Jerry Montgomery. I represent myself as a sportsman. I would like to say I consider Alternative A as unacceptable to sportsmen because of the fact that there is not enough left there for wildlife in the way of winter range and this type of thing. As a sportsman, I feel Alternative D would be more adequate to wildlife. This is why we support Alternative D.

Thank you.

MR. BAIER: Mr. Wayne Crown.

MR. CROWN: Wayne Crown from Buhl represent myself as a sportsman. I feel the same way as Jerry Montgomery. I feel that Alternative A is completely unsatisfactory for any wildlife. Of all of them I guess I would have to go along with Alternative B.

Thank you.

MR. BAIER: Thank you. Ralph Andrews.

MR. ANDREWS: My name is Ralph Andrews from Filer and I represent myself as a sportsman and I disapprove of Alternative A because I feel it is unfair to the wildlife and to the sportsmen, especially the way it treats the winter range and I would have to support Alternative B.

MR. BAIER: Ralph Crown.

MR. CROWN: I am Ralph Crown from Kimberly and I support myself as a sportsman and I don't feel that Alternative A is fair for the wildlife wintering ranges. I support Alternative D.

MR. BAIER: Thank you. Mr. Les Mai.

MR. MAI: My name is Les Mai from Twin Falls and I represent myself as a sportsman and I would like to state at this time I am not in favor of Alternative A and I do support Alternative B. I will file a written comment later.

Thank you.

MR. BAIER: Gary Deitrick.

MR. DEITRICK: My name is Gary Deitrick from Filer, Idaho, and I like to represent myself as a sportsman. I have to oppose Alternative A and go for Alternative D.

MR. BAIER: Mr. James Deitrick.

MR. DEITRICK: My name is James Deitrick. I am from Filer, Idaho. I represent myself as a sportsman. I am against Alternative A because I feel it would be detrimental to the wildlife. I would like to support Alternative D.

MR. BAIER: Mr. Arthur Kaster. Mr. Kaster. Was there any others who registered.

MRS. DANIEL: No.

MR. BAIER: Is there anyone else who would like to present testimony? If no one else would like to present testimony at this time.

MR. RADTKE: I am Bill Radtke from Kimberly, and I am totally against Alternate A and think if anything we ought to go with D and limit the amount of stock in that area. Thank you.

MR. SHARP: My name is Tom Sharp and I am a stockman from the Magic Resource Area. Just as a suggestion to the Board, I suggest that you have another open hearing where questions can be bantered between us and you concerning the environmental draft because there is a lot of people here who have not done their homework and they don't understand it. I believe if you can have another meeting like this, we could ask the Board questions about this. You would probably have different testimony. Thank you.

MR. BAIER: Thank you. Is there anyone else at this time?

56.3 MR. NELSON: I am Victor W. Nelson and I am an owner of a lot of private land and I don't think we have been consulted enough on our private land, because there is a lot more private land up in that country than there is Taylor by twice or three times more private land in that country.

I don't think you give us any credit for private land at all. The deer and the sagegrouse, we raise them on our own ground - on our ground - not on Taylor. Your Taylor land is too damn dry - it won't raise anything.

That is what I think - you don't give us private owners nothing. I have Taylor rights too, but there is nothing on it but just grass, sagebrush, and we haven't had no water development on it for years. Understand now under this program we will get some but maybe we will not. They told us before we would get some, if we do some work. We built ponds. We never got anything. That is the only thing I can say.

MR. BAIER: Is there anyone else at this time?

MR. BERRY: My name is Clyel Berry. I live in Kimberly. I would support Alternative D for the reduction in livestock use because I am a sportsman and I believe there is a definite deficit in the grazing, at least the habitat, for winter grazing on deer, sagegrouse.

We have been up there snowmobiling and it would appear to me that the only thing that comes up from the snow in the wintertime, of course, is the sagebrush or the bitterbrush. All of the crested wheat is completely snowed over so if we get rid of the sagebrush and if we do go ahead and plant crested wheat in its stead, it would appear to me that was going to make a barren desert of many of the sections up there, many of the acres.

Thank you.

MR. BAIER: Is there anyone else who would like to speak at this time. OK. Why don't we take a break for ten minutes till 7:35 and see if there are any latecomers and see if we have other witnesses. Let's adjourn till 7:35.

BREAK

MR. BAIER: I understand that Mr. Arthur Kaster is here. Mr. Kaster, would you like to submit your information for the panel.

56.4 MR. KASTER: I didn't bring no notes. I am a farmer and a stockman and I live along the border of the BLM land and they are asking for a buffer or whatever you call it of ½ mile into the BLM. I am objecting to that for several reasons.

What it does, it hibernates all the gophers and jackrabbits. I have been ate out with the jackrabbits in my life time out there and the gophers we have plenty of them. As far as the pheasant habitat is, we are going to have to feed them and if we could get compensation for feeding wildlife that would be alright, but it is on the farmer's shoulder and I am a next door neighbor of the BLM.

I get a cow out there, why, I get trespass, but their coyotes and rabbits are. I won't mention deer because we don't have any out there, but we have the gophers and all that out there. They come onto our place but we have to take care of them and that is the objection I have there because you are going to turn that into a pheasant habitat out there. We are going to have to feed them.

You think that they got to go out there for protection - that is not so - they don't go. They go there when the hunting season is on. They scatter. The rest of the time they are down there on our farms. That is about the only thing I've got to say.

MR. BAIER: Is there anyone else who would care to testify this evening?

MR. KAUFMAN: I am a farmer and I run some livestock on the Bureau land. It is my opinion that livestock and wildlife are compatible. We have put in a lot of (we, I say the Bureau, along with the range man), have put in a lot of water facilities and made more feed for the livestock as well as for the deer. I think livestock and wildlife are much more compatible than snow machines and wildlife.

MRS. CROCKETT: I am Charlott Crockett and I represent the Western Stock Growers and myself. I, too, would like to compliment the BLM on putting forth these proposals. I think either A or B is very good. I think they have been more than fair in trying to consider the cattle producers and the sportsmen.

I am kind of disappointed in people who call themselves sportsmen and see how little they consider the people that make their living off this same area.

I think like the man just before me said. The deer and cattle are compatible because one eats one thing and one eats another. Deer make their livelihood strictly on browse and the cattle live on grass.

Many of the cattle producer or sportsman, they like to hunt, and they too like to see wildlife out on the ranges. But when they start asking for more deer and more deer, they should have been up in the hills in the winter of '48 and '9. I counted 100 dead deer in two miles starved to death. And the deer got in the haystacks so bad, it took the men about all day just to chop the hay out of the stacks after the deer had been on there and many of them died because they starved to death because of the winter.

And this winter too has brought lots of deer down onto the ranches. Just about the day before yesterday I counted 20 head down on the Little Fifth Fork place scratching through trying to get the green grass. I took some hay out for them but they didn't eat it.

But in that winter I didn't see a single sportsman out putting out any hay. I never see them out there scattering any salt, and anytime you have a salt lick of the ranch, you will see where deer has eaten what the cattlemen have put out.

I think actually, as far as hunting is concerned, they have had very good hunting in the South Hills. There has been lots of deer. You can go out anytime now and see 30-40 head right along the edges of the rims where they come down into the canyons.

I think another thing we should take into consideration is that a person's livelihood and living should outweigh pleasure. But I too get pleasure from hunting and so does most everybody else. And I get pleasure out of seeing deer but I sure don't take any pleasure in seeing them starve to death like they did one winter when there gets to be too many in a small area.

MR. BAIER: Is there anyone else who would like to present testimony? We have a couple of visitors with us this evening that I would like to recognize. Mr. Mike Field, Field Representative for Senator McClure, is here this evening. Mrs. Ann Cover, who is the Chairman of the Board of Supervisors (Commissioners) in the County. Thanks for coming this evening.

Is there anyone else who would like to give testimony.

MR. CROCKETT: I am David Crockett again and this time I represent myself. I believe that Alternative A offers a good balance of all interests concerned, with a reasonable increase in livestock and wildlife in a plan.

I am interested in livestock, which is my livelihood. I also have an interest in wildlife. I believe that our property there provides enough year-round habitat for pheasants, quail, rabbits, chukars and a number of other small game animals to fill a limit for everybody in this room and quite a few of their friends for the next ten years at least.

The Fish & Game doesn't pay us a dime for this, neither do any of the people who hunt there. We also allow the deer to come in on our property in enough numbers and during a period of time that is worth a significant amount of feed and have done for at least the last 70 years, since my family has been on that property. I don't know if the Fish and Game ever make compensation for this or the BLM or the hunters.

I enjoy wildlife. I think they have a place in the balance of things and I hope that we can maintain a good supply of wildlife and habitat for them.

Incidently, I think it would be pretty rough on the wildlife if they had to live on the habitat that is left by the farmers and many of these people who can call themselves wildlife interested, hunters, and fishermen. Many of them come to our property to hunt pheasants because they burn their ditch banks. They don't even leave a place for a rabbit to live or a pheasant to have her nest.

I think if we were all really concerned about balance of wildlife and livestock, that we could all contribute a little bit more in some different areas.

All I want out of livestock grazing is a livelihood. I would like to see deer there as long as there is cattle there and as long as the land is there. But I think it is reasonable that we use a plan that has a good balance of all these areas, that makes provisions that there will be an increase and a good management for all interests. Thank you.

MR. BAIER: Is there anyone else who would like to speak.

MR. LASSEN: I am Vernon Lassen. I live in the same area where Mr. Kaster comes from. He covered my gripes pretty thoroughly. But this buffer zone that they are talking about, I think is quite ridiculous.

As far as sagebrush is concerned, it is one of my pet peeves because it fosters jackrabbits and jackrabbits were imported here from Australia. We just can't make a livelihood if we are going to have a buffer zone to protect the rabbits. You go on the desert any place you want to go and you will find rabbits where sagebrush is.

As far as pheasants, we have plenty of space on the farm for them to propagate. But we loose quite a few that don't go on the desert, just like Mr. Kaster says. They don't go on the desert to hatch their young. They usually hatch right on the farm.

That is about all I have to cover. Thank you.

MR. BAIER: Is there anyone else who would like to speak?

MR. HAMILTON: I am Bob Hamilton of Twin Falls. I got here a little late, but I just like to say that I support Alternative D.

MR. BAIER: Is there anyone else who would care to make a statement tonight? If there is no one else who wishes to make a statement, I would like to remind you that the record will remain open until March 26. You have the opportunity to send any written comments you would like to make to the District Manager in Burley anytime prior to that. The record will be closed at that time. The District Manager will go to work on preparing the final Environmental Impact Statement.

If there is anyone else who would like to make any comments.

Thank you very much for coming tonight ladies and gentlemen.

This hearing is closed.

EIS Hearing Responses

56.1 See Response 37.1.

56.2 By computing numbers supplied in Table 3-5, a figure of 1,530 deer was obtained for a 12 month period. This figure was arrived at in the following manner:

April-June	200 deer	
July-October	65 deer	
November-March	1,265 deer	
	1,530 deer	total for a 12 month period

The figures for Table 2-3 under the column heading "Proposed Wildlife Use" for Western Stockgrowers are correct. They were derived as follows:

	4/15 - 6/30			7/1 - 10/31			11/1 - 4/15		
	Deer Number	Deer Months	AUMs	Deer Number	Deer Months	AUMs	Deer Number	Deer Months	AUMs
Initial									
	200	500	100	65	260	52	1,265	6,958	1,392
Long Term									
	200	500	100	90	360	72	2,550	14,025	2,805

AUM Totals - Initial 100, 52, 1,392, 1,544 AUMs; Long Term 100, 72, 2,805, 2,977 AUMs

$$\frac{\text{800 Pounds of Forage Consumed per Month for Cattle}}{\text{150 Pounds of Forage Consumed per Month for Mule Deer}} = \text{5 Mule Deer/AUMs}$$

Deer Months = Number of Deer Per Season X Season Length in Months

$$\text{No. of AUMs Required for Deer} = \frac{\text{No. of Deer Months}}{\text{5 Deer/AUM's}}$$

800 Pounds = 1 AUM

56.3 The Twin Falls EIS adresses only the impacts of grazing on the public lands. The wildlife populaton numbers given in the EIS show only those animlas which use the public land during each season. While we recognize the importance of private land in providing habitat for wildlife, we are not in the position to manage these lands and have not addressed them in the statement. We are aware that the various wildlife species do not spend all of their time on public land. Since our data is only for the public land it is obvious that there is more wildlife and impact on private land than is addressed in the grazing EIS.

56.4 See Response 14.1.

TEXT CHANGES

Page 4, Table 2-1

Under RANGE DEVELOPMENTS, Fences, Alternative D, change "25.50" to "25.05."

Page 13, Table 2-6

Under Western Stockgrowers, change "1 mi. BG" to "1 BG" and under Squaw Joe change ".5 F" to ".5 mi. F."

Page 44, Aquatic Wildlife, paragraph 3 (Comment 49.6)

Add to last sentence: "and/or through reproduction of the native fish populations in the streams."

Page 64, GRAZING MANAGEMENT, paragraph 2 (Comment 13.2)

Change "livestock carrying capacity" to "plant basal area."

Page 87, VEGETATIVE ALLOCATION, paragraph 1 (Comment 49.8)

Remove the word "other" from the first sentence.

Page 107, GLOSSARY

Under ANIMAL UNIT MONTHS (AUM), change "4 deer or 5.3 antelope" to "5 deer, or 9 antelope."

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